

Sr. No	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
	25.03.2016	<p style="text-align: center;"><u>BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR</u></p> <p style="text-align: center;">Appeal No. 790/2015</p> <p style="text-align: center;">Khalid Naseem Khan Versus Govt. of KPK through Chief Secretary, Peshawar and another.</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>PIR BAKHSH SHAH, MEMBER.</u> Appellant with counsel (Mr. Ijaz Anwar, Advocate) and Mr. Muhammad Adeel Butt, Addl, Advocate General with Falak Nawaz, DSP (Legal) for the respondents present.</p> <p>2. At the relevant time, appellant Khalid Naseem was performing as Acting DPO Shangla. A show cause notice dated 11.02.2015 was issued to him wherein the following charges were leveled against him:-</p> <p>i. "That you have done illegal recruitment of 23 SPOs in District Shangla in the month of January/February, 2015.</p> <p>ii. That while doing this recruitment, you deliberately ignored clear instructions issued from CPO vide No. 1195-121/E-IV, dated 03.04.2014 and did not follow the procedure and criteria determined by CPO for recruitment of SPOs.</p> <p>iii. That out of 23 SPOs, some of them do not meet the</p>

required physical standards and that against the available 14 vacancies of SPOs, you issued recruitment/enlistment orders of 23 SPOs.

- iv. That 13 recruited SPOs were issued belt numbers, while 10 were not even issued belt numbers.”

The appellant submitted his detailed reply to this show cause notice wherein while denying the allegations he also wished to be heard in person. Vide impugned order dated 13.03.2015, major penalty of compulsory retirement was imposed on him against which his review petition dated 27.3.2015 was not responded, hence this appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.

3. Arguments heard and record perused.


4. The learned counsel for the appellant submitted that the appellant is innocent who started his career as ASI in the police department and reached to such high position by dint of his fairness and competence. He argued that for non compliance of letter dated 03.04.2014 copy of which is available on file, the appellant was charged but in fact this letter was not meant for district Shangla nor conveyed to the appellant who was DPO Shangla. He further submitted that under Section 29 of the Police Order, 2002, the appellant was competent for the recruitment of Special Police

Officers. He further stated that the appellant completed the process of recruitment on merits and declined to succumb to the local ~~pressure~~ ^{pressure} political and media as a result whereof they turned against the appellant and made frivolous & anonymous complaints against him. The learned counsel for the appellant stressed that once the baseless allegation came in the media, a simple show cause notice was issued to the appellant and without process of regular enquiry or opportunity of hearing, appellant was punished which is unlawful and against the norms of justice. The learned counsel for the appellant placed reliance on 2000-SCMR-75, 2003-SCMR-830, 2004-SCMR-316, 2005-SCMR-605, 2006-SCMR-846 and 2010-PLC(C.S)306 and submitted that imposition of major punishment without regular enquiry is unlawful and against the principles laid down by the august Superior Courts of the country. He concluded that the appellant has been stigmatized and his chance of further promotion was marred which promotion was most likely in the near future. He submitted that on acceptance of this appeal, the impugned order may be set aside and the appellant may be reinstated into service with all back benefits.

5. The appeal was resisted by the learned Addl. Advocate General on the ground that sufficient material of misconduct were available against the appellant, therefore, he was issued show cause notice. He further stated that the

authority was competent to dispensed with regular enquiry. He defended the impugned order and stated that opportunity of hearing was provided to the appellant by the Regional Police Officer, Malakand Region. He requested that the appeal may be dismissed.

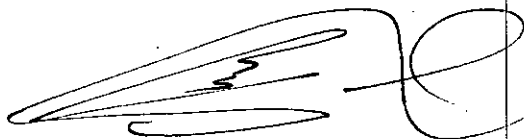
6. After perusal of the record and hearing pro & contra arguments, it was noted that there is no substantial evidence against the appellant that he used corrupt practices in the recruitment of Special Police Officers under discussion. Copy of letter dated 03.4.2014 issued from the office of Provincial Police Officer has been perused which does not show that the same was also addressed to DPO, Shangla. Section 29 of the Police Ordinance, 2002 empowers DPO for appointments of the SPOs. It was argued on behalf of the appellant that the appellant in good faith followed past practice in vogue for such appointments. But most important of all, this is the fact, that major penalty of compulsory retirement has been imposed on the appellant without process of charge sheet and regular enquiry. The record does not reveal that opportunity of hearing was given to the appellant by the competent authority. In the stated circumstances of the case, the Tribunal is constrained to conclude that since full opportunity of defence and hearing has not been given to the appellant, hence the impugned order being infirm, and standing on foundation not supported by law cannot be maintained. The same is



therefore, set aside and the appellant is reinstated into service. The intervening period be treated as leave of the kind due. The respondent department is at liberty that if so advised may initiate denovo proceedings against the appellant strictly in accordance with law/rules in which full opportunity of defence and hearing be provided to the appellant. The appeal is allowed in the above terms. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
25.03.2016


(ABDUL LATIF)
MEMBER


(PIR BAKHSH SHAH)
MEMBER

06.01.2016

Appellant with counsel and Mr. Usman Ghani, Sr.GP for respondents present. Learned Sr.GP requested for adjournment as he is not in possession of complete record and also intends to consult the respondents on certain legal issues. Adjourned for rejoinder and final hearing before D.B to 2.3.2016.



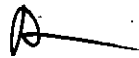
Member



Chairman

02.03.2016

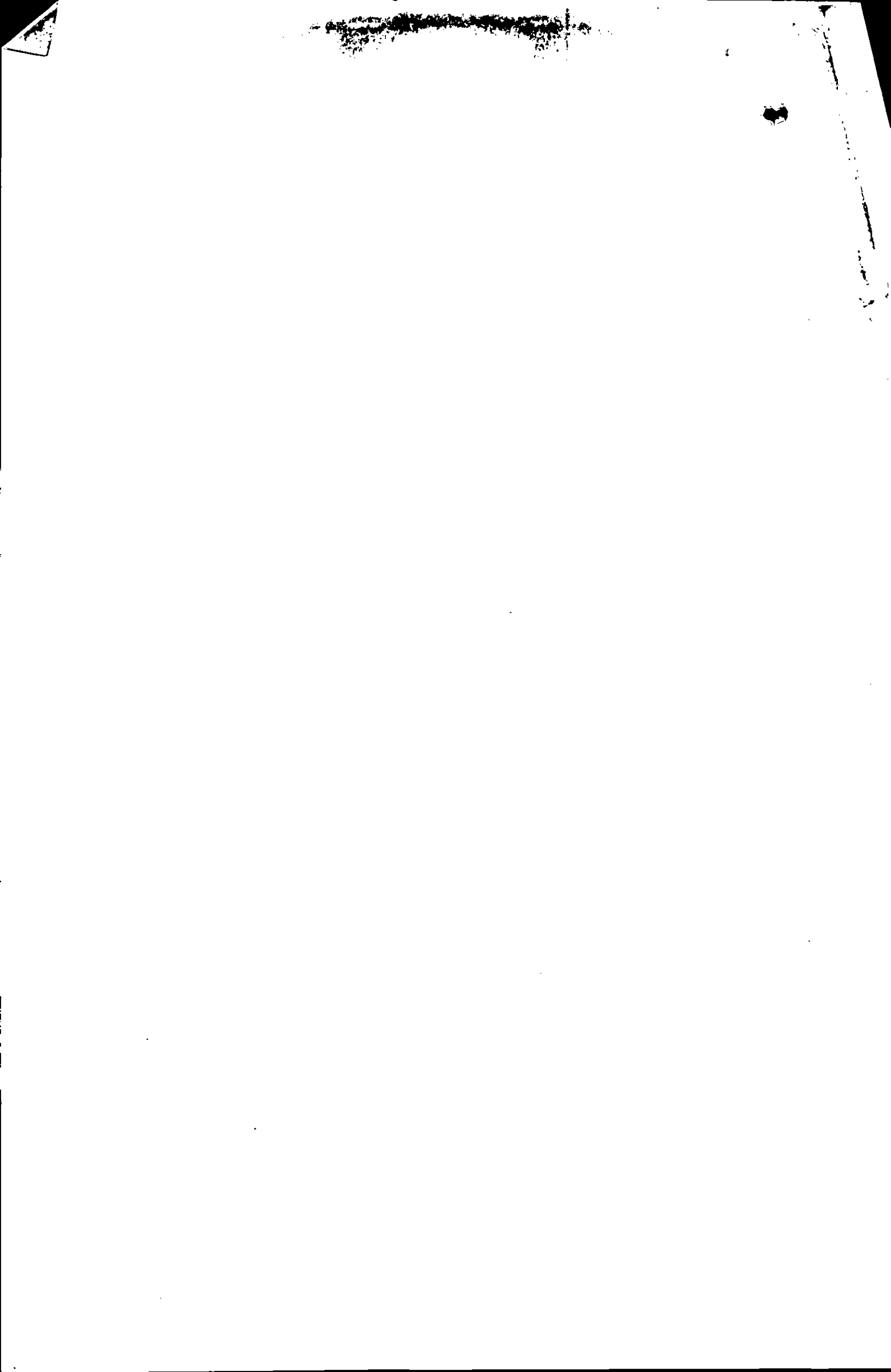
Appellant with counsel and Addl: AG for respondents present. Arguments heard. To come up for order on 25.03.2016.



Member



Member



14.07.2015

Appellant with counsel present. Learned counsel for the appellant argued that the appellant was serving as DPO Shangla when made appointments on the basis of policy for recruitment of SPOs according to which the recruitment was to be made without advertising the posts. That despite following the policy appellant was subjected to departmental inquiry and vide impugned order dated 13.3.2015 he was compulsorily retired from service regarding which he preferred review petition on 27.3.2015 which was not responded and hence the instant service appeal on 9.7.2015.

That the appellant has neither violated the policy nor any regular inquiry was conducted in the matter and hence the impugned order is a nullity in the eye of law.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 26.8.2015 before S.B.

Appellant Deposited
Security & Process Fee




Chairman

26.08.2015

Appellant in person and Mr. Falak Nawaz, DSP (legal) alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 24.11.2015 before S.B.


Chairman

24.11.2015

Appellant with counsel and Addl: A.G for respondents present. Comments submitted. The appeal is assigned to D.B for rejoinder and final hearing for 6.1.2016.

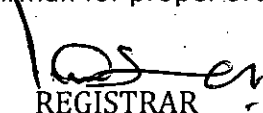


Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 790/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	09.07.2015	<p>The appeal of Mr. Khaled Naseem Khan presented today by Mr. Ijaz Anwar Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	10-7-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>14-7-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. 790 /2015

Khalid Naseem Khan, Ex DSP (DPO) Shangla R/O P. O Shiekh Maltoon Town Village Mahabat Abad Opposite Shiekh Maltoon Town Mardan.

(Appellant)

VERSUS

Govt of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Civil Secretariat Peshawar and others.


(Respondents)

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Appellant

Through


IJAZ ANWAR
Advocate, Peshawar

&


SAJID AMIN
Advocate Peshawar

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No. 790 /2015

**K.W.P PROVINCES
Service Tribunal**
Diary No. 817
dated 09-7-2015

Khalid Naseem Khan, Ex DSP (DPO) Shangla R/O P. O Shiekh
Maltoon Town Village Mahabat Abad Opposite Shiekh
Maltoon Town Mardan.

(Appellant)

VERSUS

1. Govt of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Civil Secretariat Peshawar.
2. The Inspector General of Police, Khyber Pakhtunkhwa Peshawar.

(Respondents)

Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against the impugned order dated 13.3.2015 whereby the appellant was awarded major penalty of compulsory retirement from service, against which the Review petition dated 27.3.2015 was not responded despite the lapse of 90 days.

PRAYER IN APPEAL:

On acceptance of this appeal the impugned order dated 13.3.2015 of compulsory Retirement, may graciously be set aside and the appellant may kindly be reinstated in service with full back wages and benefits.

Filed to-day
[Signature]
9/7/15

Respectfully Submitted:

1. That the appellant was inducted in Police Department as Assistant Sub Inspector and gradually earned promotion to the rank of Deputy Superintendent of Police.
2. That in the year 2014 the appellant was posted as District Police Officer Shangla and successfully commanded the District Police to the entire satisfaction of his superior and general public.

3. That during his posting at Shangla, certain posts of Special police were vacant, the appellant conducted process of selection of Special Police on merit without any fear or favour and turn down the illegal pressure of political figures and media men in appointing Special Police.
4. That the some vested interest, in order to fulfill their nefarious designs and to gain cheap popularity agitated against the selection of suitable and deserving candidates, complained with an anonymous letter.
5. That and without considering the authenticity of the complaint or the complainant, or resorting to the procedure of regular enquiry, the appellant was the appellant was suspended form service and was served with a show cause notice vide No. 1195-121/E-IV dated 3.4.2014. The appellant submitted a detailed and comprehensive reply in response to the show cause notice. In the meantime the appellant was directed to appear before the Regional Police Officer, Malakand, the appellant submitted written defense statement denying the charges leveled against him. *(Copies of the Preliminary inquiry report, suspension order dated 09.02.2015 show cause notice and reply to the show cause notice is attached as Annexure A, B C & D)*
6. That though the appellant had also prayed for personal hearing while submitting reply submitted to the show cause notice, but without affording the right of personal hearing to the appellant, he was awarded major penalty of compulsory retirement from service vide order dated 13.3.2015. *(Copy of the impugned order dated 13.03.2015, is attached as Annexure E)*
7. That the appellant submitted review petition dated 27.3.2015 against the order of his compulsory retirement of service, however, it was not replied despite the lapse of 90 days, hence the appeal inter alia on the following grounds. *(Copy of the review petition is attached as Annexure F)*

GROUND OF SERVICE APPEAL:

- A. That the appellant has not been treated in accordance with law, his right secured and guaranteed under the law has been violated.
- B. That no fair and impartial inquiry was constituted against the appellant in order to substantiate his guilt or otherwise regarding the allegations leveled against him in the show cause notice. No witness has been examined in the presence of appellant hence if any recorded cannot be used against the appellant. Similarly, the

statement of appellant was neither recorded nor his version in respect of charge was considered. Thus, the appellant has been condemned/penalized without being heard, contrary to the basic principles of natural justice known as "Audi Alteram Partem", therefore, the impugned order is against the legal norms of justice.

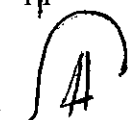
- C. That Article 29 of Police Order 2002 empowers, District Police Officer of appointment of Special Police Officer. As regards violation of CPO directions vide memo No. 1195-1211/E-IV, dated 3.4.2014, bare reading of the letter reveals that it was addressed only to District Police Officer Abbotabad, Haripur, Kohistan, Torghar, Charsadda, Buner, Chitral, Dir Lower, Upper Dir and D.I Khan. The letter was not addressed to DPO Shangla, therefore, the appellant was not in picture about the said instructions. *(Copies of the relevant page of Police Order, letters dated 03.04.2014, dated 20.06.2009 and 26.06.2009 are attached as Annexure G, H, I & J)*
- D. That only a show cause notice was served upon the appellant. No regular inquiry was conducted under the rules before passing the impugned order. The alleged inquiry conducted by Regional Police Officer Malakand in the absence of service of charge sheet and statement of allegations on the appellant is nullity in the eyes of law.
- E. That major penalty of compulsory retirement from service was imposed on the appellant without placing any convincing and reliable evidence on record in support of the alleged charges. The lawful actions of the appellant were based for departmental charge on the complaints of some vested interest. Firstly the selection of Special Police Officers was made on merit. Secondly none of the candidate was examined nor was appellant confronted with any evidence supporting the charges.
- F. That neither a charge sheet nor statement of allegations was issued to the appellant. No witness was examined in the presence of the appellant and no chance of cross examination was provided to the appellant. In the same vein appellant was not confronted with any other kind of evidence which may support malafide on the part of the appellant in making selection of Special Police. Therefore, award of major punishment of compulsory retirement from service on basis of hallowed complaints of vested interest are against the disciplinary rules and nature justice.

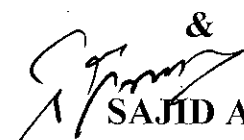
- G. That neither the candidates nor elders of the locality were examined during course of inquiry. No evidence which may suggest commission of any kind of misconduct or negligence in duty on the part of the appellant was brought on record. Therefore, the impugned order is not sustainable.
- H. That the appellant bonafidely conducted the appointment process similarly skilled persons in Special Police in the interest of department without any ulterior motive. Therefore, the lawful action of the appellant malafidely based for departmental action unwarranted by law.
- I. That the appellant have a spotless service career of about 37 years and served to the best satisfaction of superiors and public. The official record of the appellant was very clean/clear having a respectable family in Mardan District, no solid proof is available in the inquiry, he is also at the verge of retirement, the last year of service is available therefore, requested that instead of compulsory retirement which is a punishment and will be damaging his whole life as well as the life of children the punishment of compulsory retirement may kindly be set aside.
- J. That the competent authority has passed the impugned order in mechanical manner and the same is perfunctory as well as non-speaking and also against the basic principle of administration of justice, therefore, the impugned order is not tenable under the law.
- K. That the impugned order is suffering from legal infirmities and as such the same is bad in law.
- L. That the appellant seeks the permission of this Honourable Tribunal to rely on additional grounds at the hearing of this appeal.

It is, therefore, humbly prayed that on acceptance of this appeal the impugned order dated 13.3.2015 may be set aside and the appellant may kindly be reinstated in service with all consequential benefits.


Appellant

Through


IJAZ ANWAR
Advocate Peshawar


&
SAJID AMIN
Advocate Peshawar

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. _____/2015

Khalid Naseem Khan, Ex DSP (DPO) Shangla R/O P. O Shiekh Maltoon Town Village Mahabat Abad Opposite Shiekh Maltoon Town Mardan.

(Appellant)

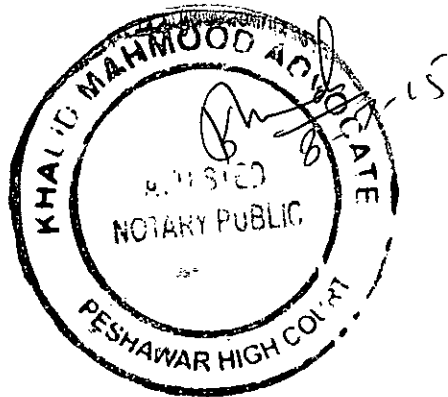
VERSUS

Govt of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Civil Secretariat Peshawar and others.

(Respondents)

AFFIDAVIT

I, Khalid Naseem Khan, Ex DSP (DPO) Shangla R/O P. O Shiekh Maltoon Town Village Mahabat Abad Opposite Shiekh Maltoon Town Mardan, do hereby solemnly affirm and declare that the contents of the above appeal are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.




Deponent

In compliance with the order of Worthy Regional Police Chief issued vide Findst: 1265-67/E, dated 10/02/2015 a detailed enquiry was conducted against the Shangla District Police and to the allegation of illegal appoint of Special Police Officers of Shangla District.

Brief facts are that the enclosed Press Cutting published in Daily Azadi on 09/02/2015 that the then District Police Officer, Shangla Mr. Khalid Naseem Khan has allegedly appointed Special Police Force personnel illegally without fulfilling legal formalities and has reportedly enticed huge amount of money ranging from one lack twenty thousands (120,000/- Pkr) per head. To thorough probe into the matter the record of Order Books of appointment of Special Force Personnel was collected from the office of SPO Clerk District Shangla. The details of appointment of SPF Constables are as follows:-

1. OB No. 11, dated 21/01/2015

- i) Islam Khan S/O Noor ul Haq R/O Barkana

2. OB No. 14, dated 28/01/2015

- i) Mukhtiar Ahmad S/O Nisar Ahmad R/O Kotkey Alpuri.
ii) Muhammad Asif S/O Muheb ul Haq R/O Alpuri.
iii) Ali Shah S/O Muhammad Biland R/O Lelawnai
iv) Hamid Ullah S/O Fazal Muhammad R/O Alpuri
v) Faseh ul Lisan S/O Salim R/O Lelawnai
vi) Abdul Hassan S/O Abdul Wahid R/O Alpuri
vii) Yousof Khan S/O Ajab Khan R/O Kotkey Alpuri
viii) Nawab S/O Fazal Malik R/O Alpuri

3. OB No. 15, dated 30/01/2015

- i) Muhammad Afsar S/O Bakht Zarin Tapla Alpuri

4. OB No. 17, dated 04/02/2015

- i) Shakir Ullah S/O Habib Ullah R/O Machar Alpuri
ii) Didar Ali S/O Rashid Ali R/O Kotkey Alpuri
iii) Inam Shah S/O Shah Yar Khan R/O Kotkey Alpuri

5. OB No. 18, dated 06/02/2015

- i) Amir Ullah S/O Muhamniad Farhad R/O Shahtoot, Karora
ii) Habib Ullah S/O Muhammad Karam R/O Bazarkot Alpuri
iii) Muhammad Salim S/O Ali Akbar R/O Dherai, PS Alpuri
iv) Habib ur Rehman S/O Muhammad Akram R/O Shawar Puran
v) Nazir Bach S/O Nasib Zada R/O Machar
vi) Bakht Sultan S/O Muhammad Azhar R/O Sandawi Puran
vii) Muhammad Azam S/O Muhammad Latif
viii) Sabir Rehman S/O Taj Muhammad R/O Lelawnai Alpuri
ix) Muhammad Naseb Khan S/O Rangen Khan R/O Bazarkot Alpuri
x) Khalid Rehman S/O Zafar Ali R/O Machar Alpuri

have been enlisted as SPOs and copy of the above Order Books are enclosed. By the perusal of OB record, necessary entry has been made in the relevant record (copy enclosed). Furthermore, the enlisted SPOs Personnel have called by control room and their measurements were re-conducted in the presence of QASI wherein the measurements of the four following constables were found deficient out of 23 appointed SPF constables.

Alleged

1. Mukhtiar Ahmad No. 378 -
2. Ali Shah No. 107
3. Nazir Badshah No. 751
4. Didar Ali No 18

7

Statements of OB Clerk Fazal Wahab No. 846 / HC, SPO Clerk Fakhri Alam and the statements of appointed SPO Constables were recorded which are attached as Annex:

(F). An advertisement, pasted on notice board in front of the office of SPF Clerk was also found wherein the general public was informed that there is no any SPF vacancy in police department (Anex: H) available in Shangla District.

Elders of the area i-e Shuid Khan S/O Muzafar Khan and Ata Ullah S/O Sheikh Farid Khan Rs/O Malak Khel, Kotkey Alpuri voluntarily recorded their statements and supported the allegations against the then District Police Officer, Shangla. Further alleged against the then DPO Shangla for receiving amount of Rs. 100000/- to Rs. 120000/- per head in the enlistment of SPOs (Anex: H). However they have not shown the names of victims.

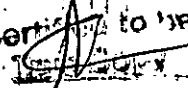
According to the report of Pay Officer District Shangla there are 14 vacancies lying vacant since January 2015 on the record while report and statement of SPO Clerk revealed that total (23) vacancies were present with the then District Police, Shangla. Whereupon the then District Police Officer, Shangla has enlisted 26 personnel in the month of January and February i.e. 3 personnel on 08.01.2015, 3 personnel on 30.01.2015, one person on 21.01.2015, 8 personnel on 28.01.2015, one person on 30.01.2015, 3 personnel on 04.02.2015 and personnel on 06.02.2015. The SPO Clerk showed his unawareness from OB No 17 dated 04.02.2015 wherein 3 personnel i.e. Shakir Ullah s/o Habib Ullah r/o Alpuri, Didar Ali s/o Arshad Ali r/o Kotkay Alpuri and Inam Shah s/o Khan Mian r/o Sabonay Kotkay. While in this regard necessary entry has been made in the relevant record. Moreover, the above mentioned 3 personnel vide OB No. 17 dated 04.02.2015 and 6 personnel i.e. Khalid Umar s/o Zafar Ali r/o Machar Alpuri, Muhammad Naseb Khan, Sabir Rahman, Muhammad Azam, Khali Rokhan and Islam Jan out of enlisted 10 personnel vide OB No. 18 dated 06.02.2015 have not issued Belt Numbers. While the remaining enlisted personnel have issued Belt Numbers. The enlisted personnel vide OB No. 11 dated 21.01.2015 have been reported their arrival in Police Lines, District Shangla while the enlisted personnel vide OB No. 17 dated 04.02.2015 and OB No. 18 dated 06.02.2015 have not reported their arrival.

Furthermore, Amir Ullah and Yousof Khan have re-enlisted in the recent enlistment while they were already been dismissed from the same force during the election 2013 on account of their involvement/political party.

According to CPO, Peshawar Memo: No. 1195-1211/E-IV, dated 03/04/2014 and this office Endst: No. 3698-3711/E, dated 06/05/2014 (Anex: H); for the recruitments of existing vacancies of SPOs a Standing Board comprising on the respective District Police Officer and Head of Investigation concerned has been constituted. For the purpose, as per laid down criteria given in Standing Order No. 1/2008 agreement / condition form is issued.

According to CPO, Peshawar Letter No. 1195:1211/E-IV, dated 03/04/2014 the recruitment will be processed by members i-e District Police Officer, concerned district and Head of Investigation of concerned district under the direct supervision of concerned Regional Police Chief. While the then District Police Officer, Shangla has not followed the same order.

According to the statements of enlisted SPOs no corruption has been committed but the elders of area Sahid Khan and Ata Ullah have supported the allegation leveled against the then District Police Officer, Shangla through Press Clipping. The SPOs also denied the statements of

Certified to be


elders of the area and added that they have given their statements on their personnel grudges because their candidates have not been enlisted in the recent recruitments. Giving so many amounts on the contract service is impossible.

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During the course of enquiry statements of most of the enlisted SPOs were recorded and all of them denied for giving illegal gratification on these posts.

Following are the brief finding of the enquiry:-

1. The recruitments of SPOs not been made under the committee instructions given by the Worthy Provincial Police Officer, Khyber Pakhtunkhwa for recruitment of SPO were ignored and recruitment was chalked out with formation of any committee.
2. Physical standard in height and chest were not met as maintained in the instruction.
3. Through publication the people of Shangla has been informed that there is no vacancy in Shangla district police. According to the rules when the vacancies occurred in the district the general public of the district will be informed through advertisement in daily News Papers accordingly. The said procedure has not been followed in this regard.
4. According to the statement of Pay Officer there are total 800 sanctioned seats of SPOs in District Shangla. According to his report 786 personnel drew their pay in the month of January 2015 which indicates that 14 seats of SPOs were vacant in the month of January. But against these 14 seats 29 SPOs were recruited in the month of January till 6th of February 2015.
5. Record of the SPF Branch was not maintained properly and SPF Clerk J/C Fakhri Alam during the inquiry failed to indicate accurate number of seats available with District Police. His figure of vacancies did not match the figure given by the Pay Officer. He is responsible for the mess in SPF Branch.

Submitted please.

(FAISAL SHAHZAD)

PSP

District Police Officer,
Shangla

(BAKHT RAJ KHAN)

A-DIG

Malakand at Saidu Sharif, Swat

①
Certified to be
True Copy

جان آڈان فریڈام میٹریل پولیس فورس مل کے صلح مشاخص

9

جوریا سے 10 جان کیا کہ میں مطابق حسد تک آڈر بنی 10 سال 2008 اور چھ بنی 1990-2005 اور 2008

بشیرت میٹریل پولیس فورس مل کے اپنا فریق سو انجام دے رہا ہوں کہ میواڈیوٹی طرف آفسوان جالا کی حکم
 اور میٹریل آڈر کے مطابق دفتر دیکھا کہ برقرار رکھا ہے جہاں تک میٹریل پولیس فورس کا جہتی کا
 ذکر ہے نہ تو میں جہتی کر سکتا ہوں اور نہ میں جہتی کرنے کا جازا ہو جہتی کا جاز صرف صلح کے پولیس سو بہرہ
 ہے وہ ہو کر ہے تو جاز ہے میوا فرم جاز آفسوان کی حکم کی تعمیل کرنا ڈیوٹی ہے میٹریل پولیس فورس جہتی
 کا جو ذکر ہے تو اس صلح میں ضاب DP صاحب نے جو دفعہ 1 جنوری سال 2015 سے خالی دیکھیوں
 کی پوزیشن طلب کی تو دفتر دیکھا کہ کو ملا ہند کرتے ہوئے صرف (23) خالی دیکھیاں کو چاہتے ہوئے
 ضاب DP صاحب کو بتا کر دفتر ہذا میں صرف (23) دیکھیاں میں تو اس صلح میں ضاب DP
 صاحب نے ورخ 2015:1:08 پر (3) بندوں کا، ورخ 2015:01:13 پر (3) بندوں کا، ورخ 2015:01:21
 پر (1) بندہ کا، ورخ 2015:01:28 پر (8) بندوں کا، ورخ 2015:01:30 پر (1) بندہ کا اور ورخ 2015:02:06
 پر (7) بندوں کا نام دیتے ہوئے کہ ایسی جہتی کا آڈر تیار کر کے آگے تو میں نے حسب حکم
 ضاب DP صاحب سے حق کوہ خاریوں پر جان کردہ بندوں کا جہتی آڈر، میڈیکل خاتم اور میٹریل
 خاتم تیار کر کے ضاب DP صاحب کو پیش کی جیسی ضاب DP صاحب نے دستخط کر کے مل (23)
 بندوں پر جیل سے نبوز بھی تقسیم کرتے ہوئے نیز آڈر دیکھ دیکھ ڈیوٹی DP صاحب کو والد کی جیسی
 مذکورہ بالا خاریوں پر آڈر دیکھ کی گئی ہیں جو کہ دیکھا کہ پر ہو رہے ہیں اس کے علاوہ جتنا ہی آڈر
 ہوئے ہیں یا ہیں یا ایسی آڈر دیکھ پوچھا ہیں یا ہیں ان سب کے بارے میں کوئی علم نہیں اور نہ
 اس کے بارے میں میں نے کوئی آڈر خاتل ضاب DP صاحب کو پیش کی ہے اور نہ جہتی یہ
 تھا ہے کہ ضاب DP صاحب نے کس واسطے کس غرض سے جہتی آڈر کیا ہیں کیونکہ دفتر ہذا
 میں مل (23) خالی دیکھیاں ہیں اس کے علاوہ کوئی بھی خالی دیکھیاں ہیں جس کو کہ ضاب DP صاحب
 سے آڈر الٹو کی ہیں میں صرف (23) خالی دیکھیوں کے بارے میں جو تک جہتی سے اسی تک
 آڈر، میڈیکل اور میٹریل پوزیشن ہو چکے ہیں سے جاجی ہوں کہ ایسی ضاب DP صاحب دستخط
 کرتے ہوئے جیل سے نبوز الٹے کر کے احکامات جاری کیے ہیں جو کہ DP صاحب کا حکم تھا
 کہ ورخ دیکھیاں خالی ہیں جاتی ہیں نہ میوا کوئی واسطے اور نہ میوا کوئی لایج تھا یہا
 کام صرف دفتر دیکھا کہ آفسوان جالا کی حکم کی تعمیل کرنا ہے اس کے علاوہ میوا کوئی
 قصور ہیں ہے یہی میوا بیان ہے جو کہ درست ہے

(Handwritten signature)

Allsted
 ADIG/MLL
 10-2-2015


فریڈام میٹریل پولیس فورس مل کے مشاخص
 10-02-2015


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FINDINGS:-

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- (i) 26-SPOs were recruited by Ex-District Police Officer, Shangla Mr. Khalid Naseem from 21/01/2015 to 06/02/2015 in a non-transparent manner without following the prescribed procedure set by the Central Police Office.
- (ii) No merit or competitive process was followed. It is clear that the recruitment was carried out to favour some politicians and personal friends.
- (iii) Out of 26 SPOs recruited, 04 do not meet the required physical standard.
- (iv) 13 recruited SPOs were issued belt numbers, while 13 were not even issued belt numbers.
- (v) 13 SPOs were recruited on 06 February 2015, although transfer order of Mr. Khalid Naseem was issued on 04 February, 2015.
- (vi) According to the statement of Pay Officer Shangla out of 800 sanctioned seats of SPOs in the District, 786 personnel drew their pay in the month of January 2015, which indicates that 14 seats of SPOs were vacant in the month of January. Against this 26 SPOs were recruited from 21st January 2015 to 6th February 2015.
- (vii) Two SPOs (Amirullah and Yousaf Khan) have been re-instated while they were dismissed from the same force during election 2013 on account of their involvement in politics.
- (viii) Record of SPF branch was not maintained properly and SPF Clerk Junior Clerk Fakhri Alam during the enquiry failed to indicate correct numbers of vacancies available in the District. His figures did not match the figures given by the pay officer.
- (ix) As a result of the enquiry the charges of illegal appointment against DSP Khalid Naseem, Ex-District Police Officer, Shangla and Junior Clerk Fakhri Alam stand proved.


(AZAD KHAN) TSt, PSP
Regional Police Officer,
Malakand, at Saidu Sharif Swat
Naqi


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By Hand

From : The Regional Police Officer,
Malakand, at Saidu Sharif, Swat.

To : Mr. Khalid Naseem,
Acting SP/Security CPO Peshawar.

No. 2050 /E, dated Saidu Sharif, the 4-3- /2015.

Subject: DEPARTMENTAL ENQUIRY

Memorandum:

Reference CPO Peshawar Memo: No. 1039-40/15, dated 11/02/2015.

Please attend this office in connection with Departmental Enquiry
against you on 06/03/2015 at 10:00 AM.

[Signature]
Regional Police Officer,
Malakand, at Saidu Sharif Swat
Naqi

2050
SP/
4/3/15

[Signature]
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(12)

Statement of Khalid Naseem (the then DPO, Shangla)

Khalid Naseem the then DPO District, Shangla (Now SP/Security CPO at Peshawar) stated on Oath, that I have been held answerable for recruitment of 23 SPOs in District Police Shangla against the prescribed procedure during posting as DPO, Shangla.

It is correct that the Merit List of 23 candidates for recruitment as Special Police Officers was prepared by SPO/Clerk duly signed by me, among these appointments, Order of 14 candidates was issued while the remaining were placed on Waiting List. When asked for method of selection of these SPO's, the concerned clerk Fakhri Alam told and disclosed that as per past practice neither any advertisement was made nor any committee had been constituted in the past for recruitment of SPOs. Record of the office of DPO, Shangla is self explainable in this regard.

In Furtherance, the SPO Clerk produced his office record consisting of standing order No. 1/2008 and standing order No. 16/2009 wherein mentioned that according to Police Order 2002, Article No. 29 empowered the DPO to appoint the Special Police Officers as well as Article 133 of the Police Order give the DPO the authority and control over Special Police Officers created under article 29 of the order. On query the clerk concerned did not produce any letter regarding instruction for the constitution of selection committee for the recruitments of SPOs issued by the CPO, Peshawar recently, due to which order of the CPO, Peshawar was not followed in the process of recruitment of SPOs.

Further Stated that, the under reference appointment of SPOs is concerned, this recruitment was conducted purely on merit and rectitudely. Actually the political figures and media persons made recommendations in respect of their numerous candidates for appointment as SPOs which was regretted by me and preference was given to Police's sons and relatives of police officers and skilled persons. Hence, they scandalized and leveled hallowed allegations against me because they were demanding for recruitment of their blue eyed candidates for personal services instead of police duty.

Though, I have been liable for not following-up the procedure as desired on behalf of your good office, it is once again assured that I was not in picture that advertisement will be published and committee will be constituted for the purpose and secondly due to my immediate transfer made me unable to intimate the same to your good office well in time. Otherwise, I would have never given the opportunity of any complaint to your good-self.


I performed the duty as DPO, Shangla devotedly and honestly and no chance of complaint was given to your good office and the alleged recruitment of SPOs was made totally on merit and bonafidely. It is remarkable to mention here that, being served as DPO, Shangla under your kind command I delivered good consistently at my level best throughout the whole period.

My entire service record is unblemished and was noted for good performance. Therefore, it is humbly requested that CPO, Peshawar may kindly be approached to set aside the allegations leveled against me and re-instate me in service from the date of suspension, Please.

Your's Sincerely,



Khalid Naseem Khan
Acting SP/Security CPO, Peshawar.



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13 ANNEX "B"

Central Police Office, Peshawar

Dated Peshawar 09 February 2015

NOTIFICATION

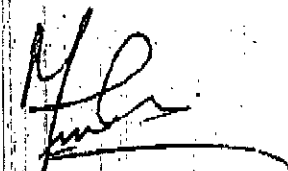
No. 1473-87 /SE-I, in continuation of this office Notification No. 1374-95/SE-I, dated 04.02.2015, Mr. Khalid Nasseem DSP (BS-17) Acting SP is hereby transferred & posted as Acting SP Security CPO Peshawar with immediate effect until further orders.

He will draw his pay etc from CCP Peshawar.

Sd/-
NASIR KHAN DURRANI
Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Endst: No. & date even.
Copy forwarded to the:-

- All Addl: Inspectors General of Police in Khyber Pakhtunkhwa Peshawar.
- Regional Police Officer Malakand at Saidu Sharif Swat.
- Capital City Police Officer Peshawar.
- Accountant General Khyber Pakhtunkhwa Peshawar.
- AIG Establishment CPO Peshawar.
- District Police Officer Shangla.
- District Account Officer Shangla.
- PSO to IGP Khyber Pakhtunkhwa Peshawar.
- PRO to IGP Khyber Pakhtunkhwa Peshawar.
- DSP Operation Room CPO Peshawar. Please fax the Notification to all concerned.
- Registrar Central Police Office, Peshawar.
- Supdt: Secret, CPO Peshawar.
- Accountant CPO Peshawar.
- U.O.P File.


(MUBARAK ZEB) PSP
DIG Headquarters,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

09 Feb. 2015 11:14 P 1

FAX NO. : 0092 091 9213165

CPK 0 P 5 BARRHQPO KPK

Confirmed to be
True copy



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

16

ANNEX "C"

No. S/1037/15, Dated Peshawar the 11.02/2014.

SHOW CAUSE NOTICE

(Under Rule 5 (3) Khyber Pakhtunkhwa Police Rules, 1975)

1. That you Khalid Naseem DSP while posted as Acting DPO, Shangla have rendered yourself liable to be proceeded under Rule 5(3) of the Khyber Pakhtunkhwa Police Rules 1975 for following misconduct;

- i. That you have done illegal recruitment of 23 SPOs in District Shangla in the month of January/February, 2015.
- ii. That while doing this recruitment, you deliberately ignored clear instructions issued from CPO vide No. 1195-1211/E-IV, dated 03.04.2014 (copy enclosed) and did not follow the procedure and criteria determined by CPO for recruitment of SPOs.
- iii. That out of 23 SPOs, some of them do not meet the required physical standards and that against the available 14 vacancies of SPOs, you issued recruitment/enlistment orders of 23 SPOs.
- iv. That 13 recruited SPOs were issued belt numbers, while 10 were not even issued belt numbers.

2. That by reason of above, as sufficient material is placed before the undersigned; therefore it is decided to proceed against you in general Police proceeding without aid of enquiry officer.

3. That the misconduct on your part is prejudicial to good order of discipline in the Police force.

4. That your retention in the police force will amount to encourage in efficient and unbecoming of good Police officers;

5. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the rules.

6. You are, therefore, called upon to show cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 for the misconduct referred to above.

7. You should submit reply to this show cause notice within 07 days of the receipt of the notice failing which an ex-parte action shall be taken against you.

8. You are further directed to inform the undersigned that you wish to be heard in person or not.

9. Grounds of action are also enclosed with this notice.

(NASIR KHAN DURRANI)
Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
Dated: / / 2014.

Received by _____

Dated: 12 / 2 / 2014.

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

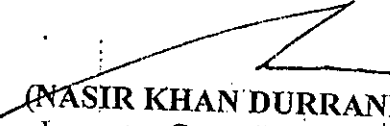
No. SI/1038/15, Dated Peshawar the 11.02/2015.


GROUND OF ACTION

That you Khalid Naseem DSP while posted as Acting DPO at Shangla committed following misconduct/s:-

- i. That you have done illegal recruitment of 23 SPOs in District Shangla in the month of January/February, 2015.
- ii. That while doing this recruitment, you deliberately ignored clear instructions issued from CPO vide No. 1195-1211/E-IV, dated 03.04.2014 (copy enclosed) and did not follow the procedure and criteria determined by CPO for recruitment of SPOs.
- iii. That out of 23 SPOs, some of them do not meet the required physical standards and that against the available 14 vacancies of SPOs. You issued recruitment/enlistment orders of 23 SPOs.
- iv. That 13 recruited SPOs were issued belt numbers, while 10 were not even issued belt numbers.

By reasons of above you have rendered your-self liable to be proceeded under Rules 5 (3) of the Khyber Pakhtunkhwa Police Rules, 1975; hence these ground of action.


(NASIR KHAN DURRANI)
Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
Dated: / /2014.


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OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR.

No. S/ 1039-40 /15, dated Peshawar the 11-02, /2015.

To: The Regional Police Officer,
Malakand Region, Swat.

Subject:- SHOW CAUSE NOTICE / GROUNDS OF ACTION.

Memo:

Enclosed please find herewith Show Cause Notice with Grounds of Action in r/o DSP Khalid Naseem (under suspension in CPO) for further necessary action.

(PERVEZ ELAHI)

Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Endst: No. & date even:-

✓ Copy of above is forwarded to DSP Khalid Naseem, Acting SP/Security CPO Peshawar for serve upon him. One copy of the same may please be returned to this office after signature as a token of its receipt.

(PERVEZ ELAHI)

Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

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(17) ANNEX "D"

Respectfully Sheweth:-

Kindly this is in response to the show cause notice bearing No. S/1037/15 dated 11.02.2015 issued to me by your good office wherein charges of recruiting 23 Special Police officers against the prescribed procedure and merit during posting period as District Police Officer Shangla have been leveled against me.

With great veneration and profound regards, respondent submits as follows in defense of the alleged charges.

That your good office was kind enough that the respondent being in the rank of DSP was assigned the duties of senior post of District Police Officer Shangla in February 2014 and I was able to deliver to the entire satisfaction of senior and superior officers as the heinous crime remained under control in the district during the posting period of respondent. Actually your good office assigned the higher responsibilities to respondent in view of the unblemished record of service and good performance reports.

This is correct that a merit list of 23 candidates for recruitment as a special Police officers was prepared by me out of which appointment order of 14 candidates was issued and the remaining were placed on waiting list. As per past practice no advertisement was published and committee was constituted for recruitment of SPOs. The office staff told and disclosed that my predecessors in office used to appoint SPOs without advertisement and constitution of committee. The record of the office of DPO Shanagla is self speaking in this regard. Actually the political figures including MPAs and persons attached with media made recommendations in respect of numerous candidates for appointment as SPOs but I did not succumb to the political pressure and made the recruitment on merit and preference was given to sons and relatives of Police officers and skilled persons. The recommendations of MPAs and media men are on the record of officer DPO Shanagla.

The selection of the sons and relatives of Police officers annoyed and prompted the political figures and media men for raising objection against selection.

Your office is once again assured that I was not in picture that advertisement will be published and committee will be constituted for

Certified
13/02/2015


recruitment of SPOs and would have never provide a chance of compliant to your good self.


The impugned appointments were made on merit and open and secret enquiry could be made about the family background of the said persons who were belonging to poor families and were earnestly desiring serving Police. The political figures were demanding recruitment on their blue eyed candidates for personal service and not for Police duty.

I performed the duties as DPO Shangla devotedly and honestly. No chance of compliant was provided to the high ups and the alleged appointment of SPOs was made on merit and bona-fidely. The political figures and media men mala-fidely leveled hallowed allegation against me.

My entire record of service is unblemished and was noted for good performance, therefore, the allegations leveled against me based on misunderstanding may please be withdrawn and I may kindly be reinstated in service from the date of suspension please. I wish to be heard in person.

Your obediently,


(Khalid Naseem Khan)
Acting SP/Security CPO,
Pesahwar.


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ANNEX- "E"

OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR.


No.S/ 1743-60/15, Dated Peshawar the 13 / 03 / 2015

ORDER.

This order is passed to dispose off departmental proceedings initiated against Mr. Khalid Naseem (now under suspension). Reports were received about Mr. Khalid Naseem, under suspension who while posted as Acting DPO Shangal to be proceeded under rule on the following grounds, under Police Rules 5(3) Khyber Pakhtunkhwa 1975.

- i) That the officer has done illegal recruitment of 23 SPOs in District Shangla in the month of January/ February 2015.
- ii) That while doing this recruitment, the officer deliberately ignored clear instructions issued from CPO vide No.1195-121/E-IV, dated 03-04-2014 and did not follow the procedure and criteria determined by CPO for recruitment of SPOs.
- iii) That out of 23 SPOs some of them do not meet the required physical standards and that against the available 14 vacancies of SPOs, he issued recruitment/enlistment orders of 23 SPOs.
- iv) That those 13 recruited SPOs were issued belt number while 10 were not issued even belt numbers.

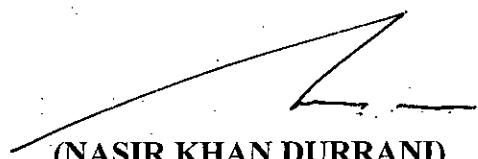
The Regional Police Officer Malakand Swat was directed to conduct enquiry and report within 10 days. A Show Cause Notice along-with grounds of action as per Police Rules 5(3) Khyber Pakhtunkhwa Police Rules-1975 was issued to the accused officer vide No.S/037/15, dated 11-02-2015 and S/1038/15 dated 11-02-2015. Reply to the Show Cause Notice submitted by the accused officer was found unsatisfactory and the Enquiry Officer in his finding report submitted that the allegations leveled against the officer stands proved.


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In the light of findings of Regional Police Officer Malakand Swat, DSP Khalid Naseem (former Acting DPO Shangla) is guilty of misconduct of irregular appointment in Special Police. Therefore, I, Nasir Khan Durrani, Inspector General of Police Khyber Pakhtunkhwa, imposed upon him the major punishment and he is compulsory retired from the service.

Order announced.




(NASIR KHAN DURRANI)
Inspector General of Police,
Khyber Pakhtunkhwa
Peshawar.

No.S/ 1748-60 /15

Copy of above is forwarded to the:-

1. Ali Addl: Inspectors General of Police in Khyber Pakhtunkhwa.
2. Regional Police Officer, Malakand Swat w/r to his letter No.2232/E, dated 11-03-2015.
3. DIG/HQrs Khyber Pakhtunkhwa Peshawar.
4. Accountant General Khyber Pakhtunkhwa.
5. AIG/Establishment CPO Peshawar.
6. DPO Shangla.
7. PSO to IGP Khyber Pakhtunkhwa.
8. PRO to PPO Khyber Pakhtunkhwa.
9. Office Supdt E-I CPO, Peshawar.

10. A-S


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TRUE COPY

To: The Inspector General of Police
Khyber Pakhtunkhwa, Peshawar.

Subject: REVIEW PETITION UNDER RULE 11 OF POLICE
RULES 1975.

Respected Sir,

With due respect and humble submission reviewing of order No S/1748-60/15 dated 13.03.2015, vide which penalty of compulsory retirement from service was imposed on petitioner is requested on the following facts and grounds.

FACTS.

- 1) That petitioner was inducted in Police Department as Assistant-Sub-Inspector and gradually earned promotion to the rank of Deputy Superintendent of Police.
- 2) That in the year 2014, petitioner was posted as District Police Officer Shangla and successfully commanded the district Police to the entire satisfaction of superior officers and general public.
- 3) That during posting period at Shangla, petitioner conducted process of selection of special police on merit without any fear and favour and turn down the illegal pressure of political figures and media men.
- 4) That the said vested interest, in order to fulfill their nefarious designs and to gain cheap popularity agitated against the selection of suitable and deserving candidates.
- 5) That your good office took notice of the baseless complaints made by vested interest and issued show-cause notice to petitioner on charges of making recruitment of special Police by ignoring the instructions of CPO vide No 1195-1211/E-IV dated 03.04.2014 on the subject matter.
- 6) That detailed and plausible reply was submitted in response to the show cause notice. Petitioner was unaware about appointing Regional Police Officer, Malakand as enquiry officer, however, on demand submitted written defense statement denying the charges before his office.

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That petitioner had prayed for personal hearing in the written reply submitted in response to the show cause notice but the impugned order was passed without providing chance of

To: The Inspector General of Police
Khyber Pakhtunkhwa, Peshawar.

Subject: REVIEW PETITION UNDER RULE 11 OF POLICE
RULES 1975.

Respected Sir,

With due respect and humble submission reviewing of order No S/1748-60/15 dated 13.03.2015, vide which penalty of compulsory retirement from service was imposed on petitioner is requested on the following facts and grounds.

FACTS.

- 1) That petitioner was inducted in Police Department as Assistant-Sub-Inspector and gradually earned promotion to the rank of Deputy Superintendent of Police.
- 2) That in the year 2014, petitioner was posted as District Police Officer Shangla and successfully commanded the district Police to the entire satisfaction of superior officers and general public.
- 3) That during posting period at Shangla, petitioner conducted process of selection of special police on merit without any fear and favour and turn down the illegal pressure of political figures and media men.
- 4) That the said vested interest, in order to fulfill their nefarious designs and to gain cheap popularity agitated against the selection of suitable and deserving candidates.
- 5) That your good office took notice of the baseless complaints made by vested interest and issued show-cause notice to petitioner on charges of making recruitment of special Police by ignoring the instructions of CPO vide No 1195-1211/E-IV dated 03.04.2014 on the subject matter.
- 6) That detailed and plausible reply was submitted in response to the show cause notice. Petitioner was unaware about appointing Regional Police Officer, Malakand as enquiry officer, however, on demand submitted written defense statement denying the charges before his office.

7) 
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That petitioner had prayed for personal hearing in the written reply submitted in response to the show cause notice but the impugned order was passed without providing chance of

personal hearing and conducting regular enquiry. Hence this review petition on the following grounds.

GROUNDS:

- A) That the impugned order has been passed without examining the facts on record and taking into account the relevant rules on the subject. Article 29 of Police Order 2002 empowers, District Police Officer of appointment of special Police Officer. As regards violation of CPO directions vide memo No: 1195-1211/E-IV dated 03.04.2014, the bare reading of the letter reveals that it was addressed only to District Police Officers Abbotabad, Haripur, Kohistan, Torghar, Charsada, Buner, Chitral, Dir Lower, Upper Dir, and D.I.Khan. The letter was not addressed to DPO Shangla, therefore petitioner was not in picture about the said instructions.
- B) That only a show-cause noticed was served upon petitioner. No regular enquiry as contemplated under the rules was conducted before passing the impugned order. The alleged enquiry conducted by Regional Police Officer Malakand in the absence of service of charge sheet and statement of allegations on petitioner is nullity in the eyes of law.
- C) That major penalty of compulsory retirement from service was imposed on petitioner without placing any convincing and reliable evidence on record in support of the alleged charges. The lawful actions of petitioner were based for departmental charge on the complaints of some vested interest. First the selection of Special Police officers was made on merit. Secondly none of the candidate was examined and similarly petitioner was not confronted with any evidence supporting the charges.
- D) That neither charge sheet nor statement of allegation was issued to petitioner. No witness was examined in the presence of petitioner and no chance of cross-examination was provided to petitioner. In the same vein petitioner was not confronted with any other kind of evidence which may support mala-fide on the part of petitioner in making selection of special Police. Therefore award of major punishment of compulsory retirement from service on bases of hallowed

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Complaints of vested interest are against the disciplinary rules and nature justice.

- E) That neither the candidates nor elders of the locality were examined during course of enquiry. No evidence which may suggest commission of any kind of misconduct or negligence in duty on the part of petitioner was brought on record. Therefore the impugned order is not sustainable.
- F) That petitioner bona-fidely accommodated sons of Police Officer and skilled persons in special Police in the interest of department without any ulterior motive. Therefore the lawful actions of petitioner were wrongly based for departmental action against petitioner.
- G) I have join Police Department in the year-1978 served upto 37 years in the best satisfaction of my superior officers and public my official record is very clean/clear having a respectable family in Mardan District no solid proof is available in the enquiry also at the verge of Retirement my last year of service is available therefore, I humble requested that instead of Compulsory Retirement which is a punishment and will be damaging my whole life as well as the life of Children the punishment of Compulsory Retirement may kindly be sit aside.

I will be pray for your long life prosperity and will be continue my service with out-standing performance, no chance of complaint will be given in my last year service.

Thanking you.

Your's Sincerely,



Khalid Naseem Khan
Ex-DSP
Cell No. 0300-5711977

Dated 27-3-2015

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District Police, as the case may be, shall within their respective spheres of authority, direct and regulate all matters of recruitment, training, postings, transfers, promotions, arms, drill, discipline, clothing, distribution of duties, and any other matter concerning the efficient fulfilment of duties by the police under his control.

28. Powers of Provincial Police Officer, Capital City Police Officer and City Police Officer concerning police accounts.--(1) Provincial Police Officer, Capital City Police Officer or City Police Officer shall have authority to investigate and regulate all matters of accounts connected with the police and all persons concerned shall be bound to give reasonable aid and facilities in conducting such investigation and to conform to his orders consequent thereto.

(2) The power of Provincial Police Officer, Capital City Police Officer and City Police Officer to regulate accounts under clause (1) shall be without prejudice to the Auditor General's authority to audit police accounts.

29. Appointment of special police officers.--(1) Subject to rules, Head of District Police may appoint special police officers for special purposes or occasions when the police available to him is not sufficient to assist the police under his command.

(2) Every special police officer so appointed shall, on appointment--

- (a) receive a certificate in the prescribed form;
- (b) have the same powers, and immunities and be liable to the same duties and responsibilities and be subject to the same authorities as a regular police officer.

30. Appointment of additional police.--(1) City Police Officer and District Police Officer subject to the approval of the Provincial Police Officer, and Capital City Police Officer may appoint additional police officers of such rank and for such time as he may deem fit for the purposes stated in their employment orders.

(2) Every additional police officer so appointed shall on appointment--

- (a) receive a certificate in a form approved by Provincial Police Officer or Capital City Police Officer or City Police Officer as the case may be;
- (b) be vested with all or any of the powers, privileges and duties of a police officer;
- (c) be subject to orders of the Capital City Police Officer, City Police Officer and District Police Officer.

(3) The employment of additional police may be made at the request of any person reasonably requiring such police and the cost of such

25

ANNEX H 001 (175)

From: The Provincial Police officer,
Khyber Pakhtunkhwa, Peshawar.

To: The Regional Police Officers,
Hazara, Malakand, Mardan,
Kohat & DIKhan.

2. The Deputy Inspector General of Police,
DCI, Khyber Pakhtunkhwa, Peshawar.

The District Police Officers,
Abbottabad, Haripur, Kohistan, Torghar,
Cheratada, Swat Chitral, Dir Lower,
Dir Upper, Manjo, DIKhan

No. 1195-1217 /B-IV dated 23/07/2014.

Subject:- DISTRIBUTION OF SPECIAL POLICE FORCE STRENGTH

The Government of Khyber Pakhtunkhwa has given two years extension to Special Police Force for the period from 1st January 2014 to 31st December 2015.

2. The distribution of strength is given as per attached proforma.
3. The RPOs/DPOs can make recruitment against the vacant seats as per laid down criteria given in standing order No. 01/2008. For recruitment of Special Police, a Recruitment Committee shall be constituted by the RPOs headed by RPO himself and comprising concerned DPO and another SP from the Range as members.
4. The RPOs to personally supervise the recruitment of Special Police Force and will be responsible to ensure transparency and merit.

(Signature)
 (SYED FIDA HASSAN SHAH)
 AIG Establishment,
 For Provincial Police officer,
 Khyber Pakhtunkhwa, Peshawar.

No. /B-IV.
 Copy to the:

1. Addl: IGP/HQs, Khyber Pakhtunkhwa, Peshawar.
2. DIG/HQs Khyber Pakhtunkhwa, Peshawar.
3. PSO to IGP, Khyber Pakhtunkhwa, Peshawar.

Attention to 2190/2014

11/02/2015
11/02/2015
11/02/2015
11/02/2015
11/02/2015

ایگزیکٹو ایڈمنسٹریٹو سروسز

(2)

قریری سجادہ مائین فریق اول (SPO) کنڈیشنل
فریق دوم گورنمنٹ آف خیبر پختونخوا ایڈمنسٹریٹو سروسز کی پارٹنر شپ ملاکنڈ راجگیں۔
فریقین کے درمیان ذیل شرائط پر مباحثہ ہونے پر پایا گیا۔

مورچہ 31/12/2015 تک

- 1- SPO کنڈیشنل
- 2- نکلے پولیس ملاکنڈ میں ہارنٹس ملازم ہوگا۔
- 3- مجاز افسرین و ٹکنو لوجیا جوائنٹ ایٹ جاری کریں گے اس کا پابند ہوگا۔
- 4- ملازم ہر وقت حکومت رولز کی طرف سے جو فرمائش ہوگی اور بجالاتے کا پابند ہوگا۔
- 5- ضلع کے کسی بھی حصے میں ملازم ہونا سے اس کی فرمائش مسترد کی جائے گی۔
- 6- ملازم ہر وقت حکومت کی طرف سے ضروری کردہ ٹیکسٹ اور 15 ڈیڑھ روپے دی جائے گی۔
- 7- ملازم کو پولیس میں بھرتی ہونے کا پابند نہیں ہوگا۔
- 8- ملازم کو کوئی پیشہ یا بجز فرمائش نہیں دی جائے گی۔
- 9- غیر حاضری کی صورت میں ایسے فرمائش مسترد کی صورت میں ایسے فرمائش ملازمت سے برطرف کیا جائے گا۔ اسی صورت میں اس کی
- 10- انہی کا کوئی حق حاصل نہیں ہوگا۔
- 11- ملازم ہر وقت حکومت کی طرف سے ضروری کردہ ٹیکسٹ اور 15 ڈیڑھ روپے دی جائے گی۔
- 12- ملازم کو غیر حاضری یا غفلت کی صورت میں ملازمت سے برطرف کیا جائے گا۔ اس کی تمام کی قانونی چارجز جوئی کا حق حاصل نہیں ہوگا۔

SPO دہلا۔
گواہان:
نام و پتہ: _____
نام و پتہ: _____
ASP/DSPs-Circle/HQs
DFO

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force
DPO Collg
NO: 15404/BU

27

ANNEX I

Flag
a.g.

MOST IMMEDIATE

The Provincial Police Officer,
N.W.F.P., Peshawar.

The District Police Officer,
Shangla.

1233
29-7-09

No. 15404/BU dated Peshawar, the 20 June, 2009.

Subject:- SPECIAL POLICE OFFICERS

MEMORANDUM

It has been decided that 800 Special Police Officers will be recruited in Shangla District on contract for a period of 2 years. The recruitment will be made equally from among the Tehsils of Shangla District.

You are directed to immediately contact Civil Administration, ISI, MI, local leaders, notables etc; to select Special Police Officers under the following criteria :-

1. Preference will be given to areas most vulnerable to militants.
2. Age between 20 and 45.
3. Height 5' 6" and Chest 30". (Condonation by DPO as per Police Rules) in case of deserving cases and non-availability of suitable candidates.
4. Those who can handle and fire on rifles should be preferred..

You are further directed to immediately contact leaders, notables and visit the camps, villages, Government Schools, localities where the IDPs are residing and immediately start the recruitment process which should be completed by not later than 24th instant. The selected persons shall report to DPO Shangla by not later than 26th. Those who can handle weapons well shall be given 7.62 Rifles with 50 rounds. The process of their training in weapon handling and discipline with firing of 50 practice rounds will be taken up incrementally at the Police Lines, Shangla.

The Special Police Officers will be paid a monthly salary of Rs.10,000/- with a pair of uniform and foot wear.

(Signature)
(MALIK NAVEED KHAN)
Provincial Police Officer,
N.W.F.P., Peshawar.

Copy forwarded to the-

1. Secretary, Government of NWFP, Home & TAs Department, Peshawar with reference to the meeting held on 20.6.09 under the chairmanship of Chief Secretary, NWFP, for information.
2. COS, HQ 11 Corps, Peshawar Cant..

✓
SPO/CLERK
DHO/PC

Adv. N/S
(Signature)

(Signature)

28

ANNEXURE J

IMMEDIATE BY FAX
Phone: 091-9272206
Fax: 091-9273165

From: The Deputy Inspector General of Police,
Operations & Training NWFP Peshawar

To: The Deputy Inspector General of Police,
Malakand Region Swat.

The DPOs, Swat, Buner, Shangla, Dir Upper & Dir Lower.

Information: The Provincial Police Officer NWFP Peshawar.

No. 523-29 PA (Ops & Trg) dated Peshawar the 26 /06/2009.

Subject: SPECIAL POLICE FORCE.

Memo: This is with reference to CPO Peshawar letter No. 6611-14/C-I dated 16-06-2009 addressed to the Home Secretary NWFP.

The competent authority has decided that 6725 personnel in Swat, Buner, Shangla, Dir Upper & Dir Lower Districts will be taken on contract as Special Police Force.

The following are the terms and conditions for enlistment and training:-

1. No advertisement will be made.
2. Residents of the above mentioned Districts to fulfill the following conditions will be enlisted:-

Age: 22 to 45 years. *Metric*

Height: 5'-6" *5' 7" 18-25 yrs.*

Chest: 30-32" *33" x 34 1/2"*

Fixed Pay per Month: Rs. 10,000/-

Uniform: Uniform will be provided by the Police Department.

Weapons: 7.62 Rifle and Ammo: will be provided by Police Department.

Contract period: 2-years

Recruitment methodology: The DPOs of above mentioned Districts are directed to immediately contact community leaders and notables of their Districts, particularly recruitment may be made from the IDPs.

*Steno
Also sent copies to
HQS for information
2 yrs. B.
DPO/...*

SPF/CLERK

OHC/P.O./DP/194

*Pr. Immediate A/C
D. ...*

DPO/...

to be

The DPOs will head the recruitment committees which will be assisted by the DCO's Rep, likewise. S.B, I.B, ISI & M.I personnel will be member of the committee for vetting of every and each individual.

No person with any hostile and adverse background may not be enlisted in the Special Police Force.

The following break-up is to be followed:-

SWAT DISTRICT:

Allocation: 3725

Distribution:

Mingora	400
Kabal	600
Matta	800
Char Bagh	425
Khwaza Khela	300
Behrain	300
Barikot	700
Saidu	200

BUNER DISTRICT: 800

DIR UPPER DISTT. 600

DIR LOWER DISTT. 800

SHANGLA DISTT. 800

Total: 6725

You are directed to immediately start the process of raising of special police force Malakand and intimate the progress. Please contact the undersigned for any clarification etc.

[Signature]
DEPUTY INSPECTOR GENERAL OF POLICE,
OPS: & TRAINING NWFP PESHAWAR.

Contract period:

2-years

Recruitment methodology :

The DPOs of above mentioned

Districts are directed to immediately contact community leaders and notables of their Districts, particularly recruitment may be made from the IDPs.

✓
SPF/CLERK

OHC/EC/DSP Hqs.

Pr. Immediate of C

D. name

True

STANDING ORDER NO. 16

30
2009
24/11/09

Village Policing


Background

The manifold increase population of our country has not only created complex problems for the Police in Urban areas, but in the Rural areas as well, where population has grown by leaps and bounds and the character and ethos of the villages has undergone a massive change.

There has been a transformation of villages into towns and the job opportunities, emerging businesses, and economic activity has resulted in mass relocations. Yet another category is of people who coverage at day time and leave in the evening, creating a floating population. Hence the need for the immediate introduction of village policing. Currently we have a rudimentary presence and patrolling system in the rural areas where 70% of our population dwells.

Under the present circumstances we have serious limitations in human and material resources to meet the requirements of crime control and maintenance of law & order.

In the past there was the system of village head man and chowkidari laid down in the Police Rules where village chowkidars used to visit the Police Stations to give important information about the village. This system has died down and has not been replaced with another institution. Thus leaving a vacuum in the village policing apparatus.


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Legal Sanction

Police Order 2002 Article 29 empowers the DPO to appoint Special Police officers for special reasons or occasions when Police available to him is insufficient. Furthermore, Article 133 of the Police Order give the DPO the authority and control over village watch men and Special Police officers created under Article 29 of the order.

Method of selection

In every village there should be one respectable, impartial, resourceful and well reputed helper of Police who will head the Special Police officers of the village. Who shall be nominated on the recommendation of the local SHO, SDPO, subject to the approval of the CCPO/DPO. He shall be incharge of the Special Police officers. The local Police should give patronage to the heads of Special Police officers created so that their authority is established in the village.

The Police officers concerned while recommending/appointing the Special Police officers shall ensure that all Special Police officers are apolitical i.e. not members or workers of any political party.

Similarly the head of the Special Police officers will recommend the names of Special Police officers who shall be selected in consultation with the local SHO & SDPO to be finally approved by the CCPO/DPO.

(Handwritten mark)

(32)

Duties of the Special Police officers

1. To keep peace in the area and their jurisdiction under the umbrella of local Police.
2. To help the Police in detection, prevention of crime, and apprehension of offenders.
3. To patrol with Police in the villages and assist in formation of and join Chigha Parties.
4. To inform Police about the persons who have no obvious source of income and are suspicious character.
5. To inform about the presence of POs and BCs.
6. To inform the Police about the disputes which are likely to lead to crime or law & order situation.
7. To inform about the epidemic disease amongst the people, animals, birds etc.
8. To inform about the refugees and other aliens and their activities.
9. To report all unreported crimes.
10. To help the Police during natural disasters.
11. To help improve the image of the local Police.

The head of the Special Police force will report to the SHOs of local Police Station periodically either in person or through diaries once in a fortnight, or could do more frequently depending on the importance and urgency of information.

The SHO/beat officer while visiting the village will periodically meet the Special Police officers for seeding information and assistance.

The SHO shall maintain a separate register which should record the activities of the Special Police force.

Guidelines

- i. In today's set up particularly to address terrorism and crime against person/Property there is a need to revamp the Rural Policing system according to the need of time.

- ii. Public cooperation the key to success. We need to mobilize public opinion and win over the support of masses to add to our strength and help us combat crime.
- iii. Police is deficient in both arms and ammunition thus the Special Police officers will be allowed to use their own licensed Arms while patrolling/conducting Nakabandies along with Police, and act under the directions of the Police beat officer during patrolling.
- iv. Timing and dates of Patrolling shall be fixed by the SHO in consultation with the head of Special Police officers in a village. A time table to the effect shall be made and displayed at Police station.
- v. Village Patrols under the direction of the Police beat officers shall be of substantial strength keeping in view the prevailing circumstances where foot patrols are under constant threat of attacks.
- vi. The CCPO/DPO could either club in a number of small villages to organize the village Police officers to perform their duties in the beats that they have already laid out for a Police station or bigger villages with complex problems and crime could be taken separately. The discretion will be with the local Police.
- vii. Quarterly meeting of all heads of Special Police officers with CCPO/DPO will be held.

Police order 2002 viz article 133 states that the CCPO/DPO will be overall supervising authority over village Police thus all the activities conducted by such special Police officers or village Police officers shall be monitored by the CCPO/DPO.

According to Police order 29 such village Police officers could be appointed as Special Police officers for duties mentioned in this order by CCPO/DPO, and he could on appointment.

- a. Issue a certificate to the effect and I.D card valid for one year only.
- b. And they would be liable to same duties and responsibilities and have the same immunities and powers as a regular Police officer.

(A)

(34)

General directions:

- i. The Police station should have an account of total villages in their jurisdiction.
- ii. The number of members of the special Police officers per village be clearly pointed out.
- iii. The area of patrolling be notified and earmarked.
- iv. Patrol timings and dates be laid out.
- v. Beat patrol officers from regular force be earmarked to accompany the patrolling parties of the village.
- vi. Incentives to volunteers for joining such special Police officers be emphasized such as:
 - a. Commendation certificate.
 - b. Rewards.
 - c. Weight-age in Police recruitment. A certain percentage of vacancies will be earmarked for those with one year clean service as special Police officer.

Malik Naveed Khan
(MALIK NAVEED KHAN)
Provincial Police Officer,
NWFP, Peshawar.

No. 11720-62 /C-I, dated Peshawar, the 23/11/2009.

Copy to:

1. Chief Secretary, Government of NWFP.
2. Addl: Chief Secretary (Home), Govt. of NWFP, Peshawar.
3. MS to Governor, NWFP.
4. PSO to Chief Minister, NWFP.
5. CCPO, Peshawar & DPOs Charsadda & Nowshera for compliance within a month by certifying that such special Police offices have been established as per Article 29/133 of the Police Order 2002.
6. Addl: IGP/Operations, NWFP, Peshawar.
7. Addl: IGP/HQrs., NWFP, Peshawar.
8. Addl: IGP/Investigation, NWFP, Peshawar.
9. Addl: IGP/Special Branch, NWFP, Peshawar.
10. All RPOs & DPOs in NWFP.

C. U. ...

ANNEXED "K"

(35)

From: The District Police Officer,
Shangla

To : The Regional Police Officer,
Malakand at Saidu Sharif, Swat

No : *549* /SB, Dated Alpuri the *03/03* /2015

SUBJECT: **APPLICATION REINSTATEMENT
IN SERVICE (SPOs) DISTRICT SHANGLA**

Memo:

Kindly refer to Region Office Swat Endst: No. 1665/E, dated 20.02.2015.

It is submitted that reinstatement of 23 SPOs was cancelled on the following grounds:-

- I. According to point 3 of CPO Peshawar letter No. 1195-1211/E-IV, dated 03.04.2015, the Regional Police Officer shall constitute a committee for recruitment of SPOs under his own chairmanship and DPO of the concerned District alongwith one SP from the Range would be the members of such committee. In this case, RPO Malakand did not constitute any such committee and inductions into Special Police Force after 19 January were carried out ignoring instructions of CPO Peshawar.
- II. In few cases physical standard in height in chest were not met as maintained in the instructions.
- III. According to the statement of Pay Officer there are total 800 sanctioned seats of SPOs in District Shangla. According to his report 786 personnel drew their pay in the month of January 2015 which indicates that 14 seats of SPOs were vacant in the month of January. But against these 14 seats 29 SPOs were recruited in the month of January till 6th February 2015.
- IV. Record of the SPF Branch was not maintained properly and SPF Clerk J/C Fakhre Alam during the inquiry failed to indicate accurate number of seats available with District Police. His figure of vacancies did not match the figure given by the Pay Officer. He is responsible for the mess in SPF Branch.

Report is submitted please

M. O. ...
 District Police Officer,
 Shangla

Confirmed to ...

Handwritten notes on the right side of the page, including the number 4682335 and the date 26/2/015.

Main body of handwritten notes, organized into several sections with horizontal lines. The text is mirrored or repeated across the page, possibly due to scanning or bleed-through. Includes various numbers and names.

15501-6387-464

Amankh

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15501-6051204-7

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15501-1488143-2

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15501-2704715-1

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15501-0083957-8

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Police Department

LIST OF ENLISTED SPOs IN SPEC

S#	NAME & No	FATHER NAME	RESIDENCE
1	Muhd Sadiq No 193	Gul Namraz	Lilowani
2	Sher Ali No 190	Gul Zamin	Shangla Top
3	Mst Hanifa BiBi No 370	Muhd Musa	Aloch
4	Mst Khilwat BiBi No 226	Tasneem Gul	MlanKalay
5	Aslam Shah No 757	Samar Shah	Beher Martun
6	Mst Nasim Akhtar BiBi No 68	Dilawar	Kuzkana
7	Muhd Bashir No 247	Muhd Younas	M/Khel Kotka
8	Farman Ali No 522	Gul Shah	Butyal Beshan
9	Inam Ullah No 77	Faiz ul Haq	Alpuri

District Officer

OFFICE OF THE DISTRICT OFFICER

OFFICE OF THE DISTRICT OFFICER

(524)


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ORDER

38



Mr. Muhammad Sadeeq s/o Gul Namraz r/o Kozkaly Lilownai Tehsil Alpuri District Shangla is hereby enlisted in Special Police Force on purely contract for a period of 06 Months on fix pay Rs: 10000/- (Rupees ten thousand only) per month with effect from 15 January 2013 to 30th June 2013 subject to medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will be governed by rules terms and conditions as envisaged in the Dy: Inspector General of Police. Operations & Training. KPK Peshawar Memo No.523-29/PA (Ops: & Trg:), dated 26.06.2009 and CPO Peshawar Office Memo No. 15098/I-II, dated 04.07.2011.

Najeeb

Najeeb Ur Rahman Bugvi (psr)
District Police Officer,
Shangla

OB No. 08

Dated 17/01/2013.

OFFICE OF THE DISTRICT POLICE OFFICER SHANGLA

No. 74 / 11 Dated Alpuri the 17 / 01 / 2012.

Copy to the District Accounts Officer, Shangla for information and necessary action please.

Najeeb

Najeeb Ur Rahman Bugvi (psr)
District Police Officer,
Shangla


Certified to be
True Copy

ORDER

Mr. Sher Ali s/o Gul Zarin r/o Shanglatop Tehsil Alpuri District Shangla is hereby enlisted in Special Police Force on purely contract for a period of 06 Months on fix pay Rs: 10000/- (Rupees ten thousand only) per month with effect from 21 January 2013 to 30th June 2013 subject to medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will be governed by rules terms and conditions as envisaged in the Dy: Inspector General of Police, Operations & Training, KPK Peshawar Memo No.523-29/PA (Ops: & Trg:), dated 26.06.2009 and CPO Peshawar Office Memo No. 15098/E-II, dated 04.07.2011.

Najeed
Najeed Ur Rahman Bugvi (PSP)
District Police Officer,
Shangla

OB No. 09

Dated 21/01/2013

OFFICE OF THE DISTRICT POLICE OFFICER SHANGLA

No. 310 E. Dated Alpuri the 21/01/2013.

Copy to the District Accounts Officer, Shangla for information and necessary action please.

Najeed
Najeed Ur Rahman Bugvi (PSP)
District Police Officer,
Shangla

(Signature)

ORDER

40

Mst: Hanifa Bibi W/o Muhammad Musa r/o Aloch Tehsil Puran District Shangla is hereby enlisted in Special Police Force on purely contract for a period of 06 Months on fix pay Rs: 10000/- (Rupees ten thousand only) per month with effect from 23 January 2013 to 30th June 2013 subject to medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will be governed by rules terms and conditions as envisaged in the Dy: Inspector General of Police. Operations & Training, KPK Peshawar Memo No.523-29/PA (Ops: & Trg:), dated 26.06.2009 and CPO Peshawar Office Memo No. 15098/E-II, dated 04.07.2011.

Najeeb

Najeeb Ur Rahman Bugvi (PSP)
District Police Officer,
Shangla

OB No. 11

Dated 23 / 01 / 2013

OFFICE OF THE DISTRICT POLICE OFFICER SHANGLA

No. 381 /E, Dated Alpuri the 23 / 1 / 2012.

Copy to the District Accounts Officer, Shangla for information and necessary action please.

Najeeb

Najeeb Ur Rahman Bugvi (PSP)
District Police Officer,
Shangla

D
Certified to be
True Copy

41

ORDER

Mst: Khelwat Bibi W/o Tasleem Gul (Shaheed SPO) r/o Mian Kaly Bele Baba Tehsil Alpuri District Shangla is hereby enlisted in Special Police Force on purely contract for a period of 06 Months on fix pay Rs: 10000/- (Rupees ten thousand only) per month with effect from 15 January 2013 to 30th June 2013 subject to medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will be governed by rules terms and conditions as envisaged in the Dy: Inspector General of Police. Operations & Training, KPK Peshawar Memo No.523-29/PA (Ops: & Trg:), dated 26.06.2009 and CPO Peshawar Office Memo No. 15098/E-II, dated 04.07.2011.

Najeeb
Najeeb Ur Rahman Bugvi (PSP)
District Police Officer,
Shangla

OB No. 19

Dated 24 / 1 / 2013.

OFFICE OF THE DISTRICT POLICE OFFICER SHANGLA

No. 3842 /E, Dated Alpuri the 15 / 1 /2012.
Copy to the District Accounts Officer, Shangla for information and necessary action please.

Najeeb
Najeeb Ur Rahman Bugvi (PSP)
District Police Officer,
Shangla

Q
District Police Officer,
Shangla

42

Enlistment Order

... have members of this office.
Mr. Nazam Shah & Samar Shah
of Bahar Mastung Tehsil, Pardan Dist-
rial, Shangla is hereby enlisted in special
police force on purely contract for a
period of 05 months on fix pay RS:
10000/- (Rupees ten thousand only) per
month with effect from 24 January
2013 to 30th June 2013 Subject to
medical fitness and verification
of character and antecedents etc.
The service of Special Police Officers
will be governed by rules, terms and
conditions as envisaged in the Dy. Ins-
pector General of Police, Operations &
Training, KP/ Peshawar Memo No.
533-29/PA (Ops. & Trg.), dated
26.11.2009 and CP/ Peshawar
Office Memo No. 15098/1-D, dated
14.07.2011.

SB

13
29/01/13

757

Attachment Constab-
ulary No.

Count page 09

Due to his transfer/posting from
Swat District to this District Police
on permanent basis, orders issued
by the Regional Police Officer, Malak
and at Saidu Sharif, Swat endst: No.
P.7.0.

Najeeb
District Police
Shangla

Q

ORDER

Mst: Naseem Akhtar w/o Late SPO Dilawar Khan r/o Koz Kanan Tehsil Alpuri District Shangla is hereby enlisted in Special Police Force on purely contract for a period of 05 Months on fix pay Rs: 10000/- (Rupees ten thousand only) per month with effect from 1st February 2013 to 30th June 2013 subject to medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will be governed by rules terms and conditions as envisaged in the Dy: Inspector General of Police. Operations & Training. KPK Peshawar Memo No.523-29/PA (Ops: & Trg:). dated 26.06.2009 and CPO Peshawar Office Memo No. 15098/E-II, dated 04.07.2011.

Najeeb
Najeeb Ur Rahman Bugvi (PSP)
District Police Officer,
Shangla

OB No. 017

Dated 01/2 /2013.

OFFICE OF THE DISTRICT POLICE OFFICER SHANGLA
No. 139 /E, Dated Alpuri the 01 /02 /2013.
Copy to the District Accounts Officer, Shangla for
information and necessary action please.

Najeeb
Najeeb Ur Rahman Bugvi (PSP)
District Police Officer,
Shangla

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ORDER

44

Mr: Muhammad Basheer S/o Muhammad Younas r/o Malak Khel Kotkay Tehsil ALpuri District Shangla is hereby enlisted in Special Police Force on purely contract for a period of 05 Months on fix pay Rs: 10000/- (Rupees ten thousand only) per month with effect from 1st February 2013 to 30th June 2013 subject to medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will be governed by rules terms and conditions as envisaged in the Dy: Inspector General of Police, Operations & Training, KPK Peshawar Memo No.523-29/PA (Ops: & Trg:), dated 26.06.2009 and CPO Peshawar Office Memo No. 15098/E-II, dated 04.07.2011

Najeeb

Najeeb Ur Rahman Bugvi (PSP)
District Police Officer,
Shangla

OB No. 20

Dated 18/02/2013

OFFICE OF THE DISTRICT POLICE OFFICER SHANGLA

No. 703 /E, Dated Alpuri the 18/2 /2013
Copy to the District Accounts Officer, Shangla for information and necessary action please.

Najeeb

Najeeb Ur Rahman Bugvi
District Police Officer,
Shangla

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45



Mr. Farman Ali S/o Gul Shan r/o Botial Besham Tehsil Besham District Shangla is hereby enlisted in Special Police Force on purely contract for a period of 05 Months on fix pay Rs: 10000/- (Rupees ten thousand only) per month with effect from 1st February 2013 to 30th June 2013 subject to medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will be governed by rules terms and conditions as envisaged in the Dy. Inspector General of Police. Operations & Training, KPK Peshawar Memo No.523-29/PA (Ops: & Trg:), dated 26.06.2009 and CPO Peshawar Office Memo No. 15098/E-II, dated 04.07.2011.

Najeeb
Najeeb Ur Rahman Bugvi (PSP)
District Police Officer,
Shangla

OB No. 21

Dated 19 / 02 / 2013

OFFICE OF THE DISTRICT POLICE OFFICER SHANGLA
No. 728 /E, Dated Alpuri the 20 / 02 / 2013
Copy to the District Accounts Officer, Shangla for
information and necessary action please.

Najeeb
Najeeb Ur Rahman Bugvi (PSP)
District Police Officer,
Shangla

①

ORDER

Mr. Inamullah s/o Faizul Haq r/o Tapla Alpur District Shangla is here by enlisted in Special Police Force on purely contract for a period of 03 Months on fix pay Rs.10000/- (Rupees ten thousand only) per month with effect from 1st April 2013 to 30th June 2013 subject to medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will governed by rules terms and conditions as envisaged in the Deputy Inspector General of Police Operations & training KPK Peshawar Memo No. 523-29/PA (Ops. & Trg.) dated 26.06.2009 and CPO Peshawar Office Memo No.15098/E-II, dated 04.07.2011.

Najeeb Ur Rehman Bugti (PSO)
District Police Officer,
Shangla

OB No. 48
Dated: 19/04/2013

OFFICE OF THE DISTRICT POLICE OFFICER SHANGLA
No. / / 2013
A/c Dated Alpur the
Copy to the District Account Officer, Shangla for
information and necessary action please.

Najeeb Ur Rehman Bugti (PSO)
District Police Officer,
Shangla

District Police Officer,
SHANGLA

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Police Department

District Shangla

LIST OF ENLISTED SPOs IN SPECIAL POLICE FORCE DURING THE YEAR 2013

S#	Name & No	Father Name	Residence	D/O Birth	CNIC No	OB No & Date	Name of Concerned DPO
10	Musafar Zada No 571	Rasool Shah	Malra	1976	15501-4841173-1	62 dt;07.06.2013	
11	Nawab Zada No 566	Jan Sardar	Besham	1979	15502-0577470-1	-do-	
12	Muhd Haleem No 582	Masroof	Besham	1988	15502-8063604-7	-do-	
13	Habib Ullah No 632	Fazl Muhd	Besham	1988	15502-4252468-7	-do-	
14	Ikram Ullah No 375	Rozl Gui	Sundvi	1992	15502-2488892-1	-do-	MUHAMMAD HUSSAIN
15	Muhd Ibrar No 557	Muhd Nisar	Chakisar	1993	15602-5784702-7	-do-	
16	Rashid Iqbal No 107	Mujtaba	Dherai Alpuri	1992	15501-3566027-3	-do-	
17	Amjad Ali No 126	Muhd Nilaz	Achar Kotkay	1992	15501-9470694-1	-do-	
18	Farman Ali No 57	Rangeen	Bazarkot	1991	15501-1265275-3	-do-	
19	Sakhi Badshah No 212	Amir Badshah	Matta Aghwan	1982	15501-6041740-5	-do-	
20	Zahid Khan No 561	Abu Sufyan	Chakisar	1982	15501-9666624-3	64 dt; 18-6-2013	
21	Shujat Ali No 678	Muhd Ayaz	Chakisar	1980	15503-4483126-7	-do-	
22	Irfan Hussain No 479	Awal Gul	Chakisar	1990	15503-8320370-1	-do-	
23	Raees Ahmad No 695	Sheukat Ali	Chakisar	1988	15503-8006212-5	-do-	
24	Fazal Muhd No 697	Sahib Gul	Chakisar	1990	15503-2912894-3	-do-	
25	Fazal Illahi No 704	Abdul Mateen	Chakisar	1978	15503-2106939-5	-do-	
26	Irshad Ahmad No 705	Bakht Ul Uloom	Chakisar	1985	15503-4322648-5	-do-	
27	Shahzade No 95	Bakht Nazar	Alpuri	1993	15501-1372254-1	-do-	
28	Muhd Hussain No 237	Gul Hinder	Kotkay	1990	15501-6474223-3	65 dt: 19.06.2013	
29	Naeem Ullah No 719	Shamsul Haq	Sundvi	1979	15505-0212930-9	-do-	

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30	Abdullah No 43	Makhuzay	Lilowani	1986	15501-5514859-3	65 dt:19.06.2013
31	Mst: Parveen Nisa No 712	Said Anwar	Aloch	1984	15505-1470956-6	-do-
32	Ghafoor Rehman No 400	Mishkat Khan	Kotkay	1980	15501-3171825-7	-do-
33	Sadram Hussain No 511	Abdul Nazar	Alpuri	1993	15501-6028239-3	-do-
34	Asadullah No 349	Fazal Wahid	Lilowani	1992	15501-1539102-1	-do-
35	All Sher No 349	Gul Zaman	Barkalay Alpuri	1992	15501-0131587-1	-do-
36	Sharfullah No 170	Khan Muhd	Alpuri	1992	15501-6949203-5	-do-
37	Ikramullah No 266	Muhd Khan	Alpuri	1993	15501-5571543-1	-do-
38	Sardar Ali No 255	Janen	Lilowani	1986	15501-0588189-1	-do-
39	Habibur Rehman No 378	Said Ahmad	Karora	1988	15501-3003400-5	-do-
40	Muhd Serab No 407	Muhd Jan	Alpuri	1993	15501-0412589-9	-do-
41	Muhibullah No 465	Sewab Gul	Alpuri	1974	15501-7479928-1	-do-
42	Sabir Ali No 233	Muhd Bhand	Alpuri	1994	15501-9429253-7	-do-
43	Amir Sajid No 89	Abdul Karim	Lilowani	1992	15501-1905325-1	-do-
44	Ashaq Hussain No 420	Bakht Zamin	Lilowani	1982	15501-7974232-5	-do-
45	Shaheen Shah No 640	Muhd Malik	Besham	1988	15501-8679987-7	-do-
46	Salamat Khan No 55	Afsaray	Alpuri	1981	15501-7426195-7	-do-
47	Rahmat Iqbal No 308	Muhd Farid	Lilowani	1993	15501-4764925-7	-do-
48	Hazret Ali No 485	Toti	Alpuri	1987	15501-8537514-5	-do-
49	Amjed Ali No 609	Jumsaid	Chakisar	1987	15503-6997337-1	66 dt: 20.06.2013
50	Raizwan Ali No 45	Muhammad Riaz	Alpuri	1987	42401-5936775-9	-do-

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ORDER

The following candidates are hereby enlisted in Special Police Force as SPO. purely on contact basis till the expiry of contract period of SPO i.e **30.06.2013**, on fixed pay @ Rs. 10,000/- (Rupees ten thousand only) per month with effect from 1st June, 2013 subject to the medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will governed by rules terms and conditions as envisaged in the Deputy Inspector General of Police, Operations & Training, K.P.K. Peshawar memo: No.523-29/PA (Ops & Trg), Dated 26.06.2009.

S.No	Name	F Name	B/O Birth	Residence	NIC No	SPO No
1	Musafar Zada	Rasool Shah	1976	Miara Besham	1550128411731	5712
2	Nawab Zada	Jan Saddar	1979	Sadin Besham	1550205774701	566
3	Muhd Haleem	Maroof	1988	Lohore Besham	1550280636047	582
4	Habibullah	Fazal Muhd	1988	Lahore Besham	1550142524687	632
5	Ikramullah	Rozi Gul	1992	Sundvi Puran	1550524888921	375
6	Muhd Ibrar	Muhd Nisar	1993	Chidam Chakisar	1560257847027	557
7	Rashid Iqbal	Mushtaba	1992	Dehrai Alpuri	1550135660273	107
8	Amjid Ali	Muhd Niaz	1992	Achar Alpuri	1550194706941	126
9	Farman Ali	Rangeen	1991	Bazarkot Alpuri	1550112652753	57
10	Sakhi Badsha	Amir Badsha	1982	Matta Alpuri	1550160417405	212


District Police Officer,
Shangla

OB NO 62

Dated 7/6 /2013

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ORDER

Mr. Zahid Khan s/o Abusufyan r/o Chakisar is hereby enlisted in Special Force as SPO purely on contact basis for a period of one month on fixed pay Rs. (Rupees ten thousand only) per month with effect from 1st June, 2013 subject to fitness and verification of character and antecedents etc.

The service of Special Police Officers will be governed by rules and terms envisaged in the Deputy Inspector General of Police, Operations & Training Peshawar memo: No.523-29/PA (Ops & Trg), Dated 26.06.2009.


District Police Officer
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OB NO 64
Dated 18/6 /2013


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ORDER

The following candidates are hereby enlisted in Special Police Force as SPO purely on contact basis for a period of one month on fixed pay Rs. 10,000/- (Rupees ten thousand only) per month with effect from 1st June, 2013 subject to the medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will governed by rules terms and conditions as envisaged in the Deputy Inspector General of Police, Operations & Training, K.P.K, Peshawar memo: No.523-29/PA (Ops & Trg), Dated 26.06.2009.

S.No	Name	F Name	B/O Birth	Residence	NIC No	SPO No
1	Shujat Ali	Muhd Ayaz	1980	Chakisar	1550344831267	678
2	Irfan Hussain	Awal Gul	1990	Chakisar	1550383203701	479
3	Raees Ahmad	Shukat Ali	1988	Chakisar	1550380062125	695
4	Fazal Muhd	Sahib Gul	1990	Chakisar	1550329128943	697
5	Fazal Illahi	Abdul Batin	1978	Chakiar	1550321069395	704
6 x	Irshad Ahmad	Bakht Uloom	1985	Chakisar	1550343226485	705
7.	Shahzada	Bakht Nazam	1993	Chakisar	15501-1372284	95

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District Police Officer,
Shangla

OB NO 64
Dated 18/6/2013

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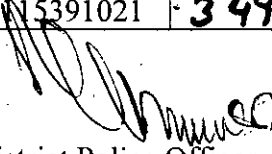
ORDER

The following candidates are hereby enlisted in Special Police Force as SPO purely on contact basis for a period of one month on fixed pay Rs. 10,000/- (Rupees ten thousand only) per month with effect from 1st June, 2013 subject to the medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will be governed by rules terms and conditions as envisaged in the Deputy Inspector General of Police, Operations & Training, K.P.K, Peshawar memo: No.523-29/PA (Ops & Trg), Dated 26.06.2009.

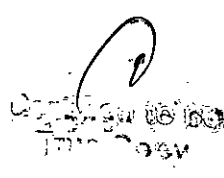
S.No	Name	F Name	B/O Birth	Residence	NIC No	SPO No
1	Muht Hussain	Gul Handar	1990	Kotkay	1550164749233	237
2	Naeemullah	Shamsul Haq	1979	Sundvi Puran	1550502129309	719
3	Abdullah	Makhuzay	1986	Lilownai	1550155148593	42
4	Mst: Parven Nisa	W/O Said Anwar	1984	Aloch	1550514709566	712
5	Ghafoor Rahman	Mishkat Khan	1980	Kotkay	1550131718257	400
6	Sadam Hussain	Abdul Nazar	1993	Alpuri	1550160282393	511
7	Assadullah	Fazal Wahid	1992	Alpuri	155015391021	349




District Police Officer,
Shangla

OB NO 65

Dated 19-6/2013



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ORDER

The following candidates are hereby enlisted in Special Police Force as SPO purely on contact basis for a period of one month on fixed pay Rs. 10,000/- (Rupees ten thousand only) per month with effect from 1st June, 2013 subject to the medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will governed by rules terms and conditions as envisaged in the Deputy Inspector General of Police, Operations & Training. K.P.K. Peshawar memo: No.523-29/PA (Ops & Trg), Dated 26.06.2009.

S.No	Name	F/Name	B/O Birth	Residence	NIC No	SPO No
1	Ali Sher	Gul Zaman	1992	Barkalay Alpuri	1550101315871	170 ✓
2	✓ Sharifullah	Khan Muhd	1992	Alpuri	15501-6848202-5	266 ✓
3	✓ Ikramullah	Muhda Khan	1993	Alpuri	1550155715431	324 ✓
4	✓ Sardar Ali	Janan	1986	Lilownai	1550105881891	255 ✓
5	✓ Habibur Rahman	Said Ahmd	1988	Bilkanai	15501-3203400-5	378 ✓
6	✓ Muhd Serab	Muhd Jan	1993	Alpuri	1550104125899	407 ✓
7	✓ Muhibullah	Sawab Gul	1974	Alpuri	1550174799281	465 ✓
8	✓ Sabir Ali	Muhd Biland	1994	Alpuri	1550194292537	232 ✓
9	✓ Amir Sajid	Abdul Karim	1992	Lilownai	1550119053251	89 ✓
10	✓ Ashiq Hussain	Bakht Zamin	1982	Lilownai	1550179742325	420 ✓
11	✓ Shaheen Shah	Muhd Malik	1988	Besham	1550286799877	640 ✓
12	✓ Salamat Khan	Afsary	1981	Alpuri	1550174261957	55 ✓
13	✓ Rehmat Iqbal	Muhd Farid	1993	Lilownai	1550147649257	308 ✓
14	✓ Hazrat Aftab Tofti		1987	Alpuri	15501-8537545	485 ✓

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District Police Officer,
Shangla

OB NO 65
Dated 19/6/2013

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ORDER

The following candidates are hereby enlisted in Special Police Force as SPO purely on contact basis for a period of one month on fixed pay Rs. 10,000/- (Rupees ten thousand only) per month with effect from 1st June, 2013 subject to the medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will governed by rules terms and conditions as envisaged in the Deputy Inspector General of Police, Operations & Training, K.P.K, Peshawar memo: No.523-29/PA (Ops & Trg), Dated 26.06.2009.

S.No	Name	F Name	B/O Birth	Residence	NIC No	SPO No
1 ✓	Amjad Ali	Jumsaid	1987	Chakisar	1550369973371	609
2 ✓	Rizwan Ali	Muhd Riaz	1987	Alpuri	4240159367759	45




District Police Officer,
Shangla


OB NO 66

Dated 20/6 /2013


20/6/2013

LIST OF ENLISTED SPOs IN SPECIAL POLICE FORCE DURING THE YEAR 2013

S#	Name & No	Father Name	Residence	D/O Birth	CNIC No	OB No & Date	Name of Concerned DPO
51	Gawhar Ali No 782	Badshah Gul	Lilowanl	10.04.1982	15501-3449719-1	98 dt:02.09.2013	
52	Halder Ali No 485	Ali Bash Khan	Shangla Top	03.12.1991	15501-2221592-9	-do-	
53	Sardar Ali No 777	Bekht Mand	Shahpur	01.01.1986	15501-4141613-1	-do-	
54	Lady Wahida BIBI No 792	w/o Irshad Ali	Alpuri	01.01.1991	15502-2238856-6	-do-	
55	Muzafer Khan No 794	Lal Karim	Alpuri	01.01.1991	15501-6938029-1	-do-	
56	Zaibullah No 612	Muhammad Hussain	Olander	01.01.1981	15501-4904935-5	-do-	GULZAR ALI KHAN
57	Hazrat Ali Shah No 767	Sher Zada	Amnovi	01.01.1981	15501-1212866-3	-do-	
58	Muhammad Suliman No 786	Muhammad Jan	Alpuri	03.04.1988	15501-8968320-1	-do-	
59	Hazrat Umar No 538	Bawer Khan	Alpuri	02.02.1981	15501-4768136-9	-do-	
60	Farman Ali No 663	Hamish Gul	Lilowanl	07.08.1993	15501-3506902-7	-do-	
61	Muhammad Ibraheem No 275	Muhammad GUL	Aloch	1978	15505-0214524-1	-do-	
62	Javid Hussain No 383	Amir Alam	Aloch	04.01.1981	15505-3416720-9	98 dt:02.09.2013	
63	Jalal Khaliq No 505	Fazal Khaliq	shahpur	01.01.1988	15501-7096757-1	-do-	
64	Noor ul Bashir No 743	Khan	Kotkey	03.03.1973	15501-2285519-9	-do-	
65	Basher Ahmad No 141	Noor Muhammad	Kotkey	1981	15501-9604557-3	-do-	
66	Gawhar Ali No 280	Noor Rehman	Aloch	04.03.1986	15505-3074091-6	-do-	
67	Muhammad Izhar No 140	Zarif Khan	Malra Besham	10.09.1992	15501-6474955-3	-do-	
68	Noor Ul Amin No 297	Shah Parsan	Lilowanl	16.05.1981	15501-2234820-1	-do-	
69	Abdul Baqi No 221	Usman Ghanl	Aloch	15.04.1992	15505-437439-7	-do-	
70	Dunfa Khan No 625	Kherojan	Aloch	03.03.1991	15505-2379367-7	-do-	


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71	Fazal Habib No 254	Fazal Miraj	Ulownai	1968	15501-9997858-9	-do-
72	Sher Zada No 739	Ziarat Gul	Bar Pura Aloch	01-01-1992	15505-7188674-9	-do-
73	Mehtab Alam No114	Muhammad Ashraf	Dheri Alpuri	01-05-1989	15501-1781075-5	113 dt:01-01-2013
74	Amir Muhd No 51	Miraj	Besham	01-03-1989	15502-4288228-3	-do-
75	Amjad Ali No 295	Saifur Rehman	Shahpur	01-01-1988	15501-9548701-1	-do-
76	Muhd Ali No 461	Sanobar	Shahpur	01-01-1986	15501-4056937-1	-do-
77	Muhd Ishaq No 501	Fazal Ghan	Damoria	01.01.1986	15501-22732694-7	-do-
78	Sher Khan No 670	Mandrey	Besham	01.01.1974	15502-8337862-1	-do-
79	Imran Khan No 81	Swal Faqir	Besham	01.01.1991	15501-9598657-3	-do-
80	Amanullah Khan No 725	Bakht Rahim	Karora	21.12.1988	15501-3609734-7	-do-
81	Fazal Rabi No 458	Abdur Rabi	Olandar	15.03.1988	15501-5283767-1	-do-
82	Faisal Hayat No 643	Difarooz	Sanila	01.03.1992	15505-7069530-9	116 dt:07.10.2013
83	Muhd Haleem No 364	Ghazi Khan	Bilkani	1989	15501-1454189-7	127 dt:04.11.2013
84	Akhtar Ali No 83	Dilaram Khan	Dherai Alpuri	1992	15501-8007243-1	-do-
85	Bakht Alam No 418	Muhd Sher	Bazarkot	1995	15501-474106-6	-do-
86	Waqas Ahmad No 587	Muhd Musa	Aloch	01.11.1993	15505-9658205-1	136 dt:28.11.2013
87	Said Alam No 486	Salahudin	Matta Aghwan	15.04.1993	15501-2723484-9	-do-
88	Imranullah No 667	Fazal Rahman	Lilowanl	01.01.1993	15501-9145851-5	-do-
89	Masud Alam No 265	Shah Akbar Khan	Dherai Alpuri	02.01.1992	15501-8358692-1	-do-
90	Rahman Ali No 756	Muhd Pervez	M/Khel Kotkay	1980	15501-2272787-3	140 dt:10.12.2013
91	Nadeem Khan No 5	Abdul Wedood	w/Khel Kotkay	1993	15501-8044351-9	-do-
92	Matullah No 33	Malik Zada	Sundavi	1994	15505-9526539-1	-do-
93	Ajmal Khan No 604	Amroz Khan	Aloch	1973	15505-0214150-3	-do-

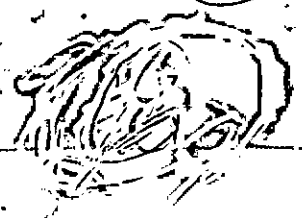
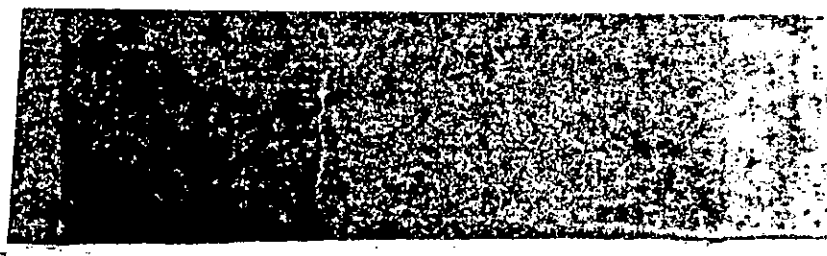
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94	Qavl Khan No 330	Sher Malook	Kotkay	1995	15501-4859049-9	140 dt: 10.12.2013
95	Yousef Khan No 655	Ahmad Jan	Besham	1973	15501-5868883-9	141 dt: 12.12.2013
96	Umar Hayat No 352	Khaista Muhd	Alpur	1993	15501-2313879-9	62 dt: 02.01.2014
97	Bacha Hussain No 328	Fazal Muhd	Buner Dheri	1993	15501-2869438-9	-do-
98	Saadullah Khan No 428	Sher Ghalib	Bazarkot	1984	15501-4607128-9	-do-
99	Muhd Ali No 322	Said Sultan	Alpur	1991	15501-4830684-5	-do-
100	Muhd Ali Shah No 732	Taj Bakht Sultan	Llowani	1970	15501-2667733-9	-do-
101	Sher Muhd No 184	Hamish Gul	Alpur	1976	15501-7840529-3	24 dt: 21.02.2014
102	Najeebullah No 710	Abdur Rafi	Bilkanal	1994	15501-4363627-3	-do-

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ORDER:

The following candidates are hereby enlisted in Special Police Force as SPO purely on contract basis for a period of 4 Months on fixed pay Rs.10,000/- (Rupees ten thousand only) per month with effect from 1st September 2013 to 31.12.2013 subject to the Medical Fitness and verification of character and antecedents etc.

The service of Special Police Officers will governed by rules terms and condition envisaged in the Deputy Inspector, General of Police, Operation & Training Khyber Pakhtunkhwa Peshawar memo No: 523-29/PA (Ops & Trg) Dated 26.06.2009.

S. NO	Name	F/Name	D/O Birth	Residence	CNIC	SPO NOs
1	Gohar Ali	Badshah Gul	10.04.1982	Lilownai	15501-3449719-1	782
2	Hedar Ali	Ali Bash	03.02.1991	Shangla	15501-2221892-9	768
3	Sardar Ali	Bakht Mand	01.01.1986	Shah Pur	15501-4141613-1	777
4	Wahida Bibi	W/o Arshad Ali	01.01.1991	Alpuri	15502-2238856-6	792
5	Muzafar khan	Lal Karim	01.01.1991	Shah tot	15501-6938029-1	794
6	Zaib ullah	Muhammad Hussain	01.01.1991	Olandar	15501-4904935-5	612
7	Hazrat Ali Shah	Sher Zada	01.01.1981	Annavi	15501-1212866-3	767
8	Muhammad Suliman	Muhammad Jan	03.04.1988	Alpuri	15501-8968320-1	786
9	Hazrat Umar	Bawar khan	02.02.1981	Machar	15501-4768136-9	538
10	Farman Ali	Hamish Gul	07.08.1993	Lilownai	15501-3506902-7	663
11	Muhammad Ibrahim	Muhammad Gul	1978	Puran	15505-0214524-1	275
12	Javid Hussain	Amir Alam	04.01.1981	Puran	15505-3416720-9	383
13	Jalal Khaliq	Fazal Khaliq	01.01.1988	Shahpur	15501-7096757-1	505
14	Noor Basar	Khan	03.03.1973	Kotkay	15501-2285190-9	743
15	Bashir Ahmad	Zoor Muhammad	1981	Kotkay	15501-9604557-3	141
16	Gohar Ali	Noor Rahman	04.03.1986	Puran	15505-3074091-6	280
17	Muhammad Izhar	Zarif khan	10.09.1992	Mira	15501-6474955-3	140
18	Noor ul Amin	Shah Pursand	16.05.1981	Lilownai	15501-2234820-1	297
19	Abdul Baqi	Usman Ghani	15.04.1992	Bengalai	15505-437439-7	221
20	Dunya khan	Kharoon Jan	03.03.1991	Atoch	15505-2379367-7	625
21	Fazal Habib	Fazal Miraj	1986	Lilownai	15501-9997858-9	254
22	Sher Zada	Zeyarat Gul	01.01.1972	Bar Puran	15505-7188674-9	739

OB No 98

Dated 2-9-13

(Gulzar Ali Khan)
District Police Officer,
Shangla.

Certified to be
True Copy

59

ORDER:

The following candidates are hereby enlisted in Special Police Force as SPO purely on contract basis for a period of 3 Months on fixed pay Rs.10,000/- (Rupees ten thousand only) per month with effect from 1st October 2013 to 31.12.2013 subject to the Medical Fitness and verification of character and antecedents etc.

The service of Special Police Officers will be governed by rules terms and conditions envisaged in the Deputy Inspector General of Police, Operation & Training Khyber Pakhtunkhwa Peshawar memo No: 523-29/PA (Ops & Trg) Dated 26.06.2009.

S. N	Name	F/Name	D/O Birth	Residence	CNIC	SPO NOs
1	Mehtab Alam	Muhammad Ashraf	01.05.1989	Dherai Alpuri	15501-1781075-5	114
2	Ameer Muhammad	Siraj	01.03.1989	Besham	15502-4288228-3	51
3	Anjad Ali	Saif Ur Rahman	01.01.1988	Shahpur	15501-9548701-1	295
4	Muhammad Ali	Sanobar	01.01.1986	Shahpur	15501-4056937-1	461
5	Muhammad Ishaq	Fazal Ghani	01.01.1974	Damorai	15501-2273694-7	501
6	Sheer Khan	Mandray	01.01.1991	Besham	15502-8337862-1	670
7	Imran Khan	Swal Faqir Shah	01.01.1982	Besham	15502-9598657-3	81
8	Aman Ullah Khan	Bakht Rahim	21.12.1988	Dherai Bilkani	15501-3609734-7	725
9	Fazal Rabbi	Abdul Rabbi	15.03.1988	Olandar	15501-5283767-1	458

OB No 113

Dated 1-10-13

(Gulzar Ali Khan)
District Police Officer,
Shangla.

True COPY

60

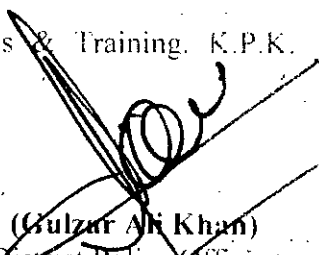


B# NO 643

ORDER

Faisal Hayat s/o Dillfroz r/o Sanila Puran Police Station Aloch is hereby enlisted in Special Police Force as SPO purely on contact basis for a period of three month on fixed pay Rs. 10,000/- (Rupees ten thousand only) per month with effect from 1st October, 2013 subject to the medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will governed by rules terms and conditions as envisaged in the Deputy Inspector General of Police. Operations & Training. K.P.K. Peshawar memo: No.523-29/PA (Ops & Trg), Dated 26.06.2009.


(Gulzar Ali Khan)
District Police Officer
Shangla

OB NO 116

Dated 7-10 /2013


Certified to be
True Copy

(61)



ORDER

The following candidates are hereby enlisted in Special Police Force as SPO purely on contact basis for a period of two month on fixed pay Rs. 10,000/- (Rupees ten thousand only) per month with effect from 1st November to 31th December, 2013 subject to the medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will governed by rules terms and conditions as envisaged in the Deputy Inspector General of Police, Operations & Training. K.P.K. Peshawar memo: No.523-29/PA (Ops & Trg), Dated 26.06.2009.

S.No	Name	F Name	B/O Birth	Residence	NIC No	SPO No
1	Muhd Haleem	Ghazi Khan	1989	Bilkanai	15501-1454189-7	364
2	Akhtar Ali	Dilaram Khan	1992	Dherai Alpuri	15501-8007243-1	83
3	Bakht Alam	Muhd Sher	1995	Bazarkot Alpuri	15501-4794106-6	418

~~Signature~~
District Police Officer,
Shangla

OB NO 127

Dated 4-11- /2013

(9)
Certificate
true copy

(62)

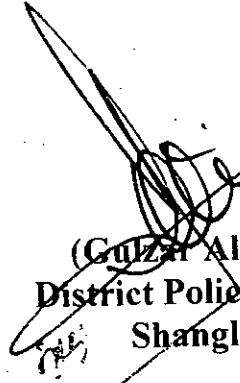
ORDER:

The following candidates are hereby enlisted in Special Police Force as SPO purely on contract basis for a period of 1 Months on fixed pay Rs.10,000/- (Rupees ten thousand only) per month with effect from 1st December 2013 to 31.12.2013 subject to the Medical Fitness and verification of character and antecedents etc.

The service of Special Police Officers will governed by rules terms and condition envisaged in the Deputy Inspector General of Police, Operation & Training Khyber Pakhtunkhwa Peshawar memo No: 523-29/PA (Ops &Trg) Dated 26.06.2009.

S. NO	Name	F/Name	D/O Birth	Residence	CNIC	SPO NOs
1	Waqas Ahamd	Muhammad Musa	01.11.1993	Aloach	15505-9658205-1	587
2	Said Alam	Salah Uddin	15.04.1993	Mata Agwan	15501-2723484-9	486
3	Imran Ullah	Fazal Rahmat	01.01.1993	Lilownai	15501-9145851-5	667
4	Muhammad Aalam	Shah Akbar Khan	02.01.1992	Dheri Alpuri	15501-8658692-1	265

OB No 136
Dated 28-11-13


(Gulzar Ali Khan)
District Police Officer,
Shangla.


True Copy

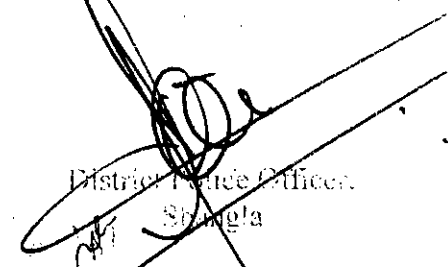
63

ORDER

The following candidates are hereby enlisted in Special Police Force as SPO on contact basis for a period of one month on fixed pay Rs. 10,000/- (Rupees ten thousand only) per month with effect from 1st December, 2013 to 31st December, 2013 subject to medical fitness and verification of character and antecedents etc


The service of Special Police Officers will be governed by rules, terms and conditions envisaged in the Deputy Inspector General of Police, Operations & Training Peshawar memo: No.523-29/PA (Ops & Trg), Dated 26.06.2009

S. No	Name	F.Name	D/O Birth	Residence	NIC No	SPO No
1	Rahman Ali	Mulid Pervez	1980	Malak Khel Kotkay	15501-2272787-3	756
2	Nadem Khan	Abdul Wadud	1993	Wahab Khel Kotkay	15501-8044351-9	05
3	Matiullah	Malak Zada	1994	Sundvi Puran	15505-9526539-1	33
4	Ajmal Khan	Amroz Khan	1973	Enawar Puran	15505-0214150-3	804
5	Qavi Khan	Sher Malook	1975	Malak Khel Kotkay	15501-4859049-9	330


 District Police Officer
 Shangla

OB NO 140

Dated 10/12/2013


 District Police Officer
 Shangla

64



ORDER

SPO Yousaf Khan No. 655 discharged from service vide this office OB No. 134 dated 25.11.2013 is hereby reinstated in service with effect from 1st December, 2013.

~~District Police Officer,
Shangla~~

OB NO 141

Dated 12/12/2013


Certified to be
True Copy

65



ORDER

The following candidates are hereby enlisted in Special Police Force as SPO purely on contact basis expiry of the Special Police Force on fixed pay Rs. 10.000/- (Rupees ten thousand only) per month with effect from 15th December, 2013 subject to the medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will governed by rules terms and conditions as envisaged in the Deputy Inspector General of Police, Operations & Training, K.P.K, Peshawar memo: No.523-29/PA (Ops & Trg), Dated 26.06.2009.

S.No	Name	F Name	B/O Birth	Residence	NIC No	SPO No
1	Umar Hayat	Khaista Muhammad	1993	Lilownai Alpuri	15501-2313879-7	352 ✓
2	Sadullah Khan	Sher Ghalib	1984	Bazarkot Alpuri	15501-4607128-9	428 ✓
3	Bacha Hussain	Fazal Muhammad	1993	Bunr Dherai	15501-2869438-9	328 ✓
4	Muhammad Ali	Said Sultan	1991	Lerai Alpuri	15501-1830684-5	322 ✓
5	Muhd Ali Shah	Taj Bakht Sultan	1970	Lilownai	15501-2661733-9	732 ✓

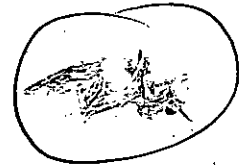
~~Ali~~
District Police Officer,
Shangla

OB NO 02

Dated 02/01/2014

TRUE COPY

66



ORDER

The following candidates are hereby enlisted in Special Police Force as SPO purely on contact basis for a period on the expiry of SPF fixed pay Rs. 10,000/- (Rupees ten thousand only) per month with effect from 25th December, 2013 subject to the medical fitness and verification of character and antecedents etc.

The service of Special Police Officers will be governed by rules, terms and conditions as envisaged in the Deputy Inspector General of Police, Operations & Training, K.P.K. Peshawar memo: No.523-29/PA (Ops & Trg). Dated 26.06.2009.

S.No	Name	F Name	B/O Birth	Residence	NIC No	SPO No
1	Sher Muhd	Hamish Gul	1976	Alpuri	15501-7840529-3	184
2	Najibullah	Abdur Rabi	1994	Bilkanai	15501-4363627-3	710

~~District Police Officer,
Shangha~~

OB NO 24
Dated 21-2 /2014

District Police Officer,
Shangha

POWER OF ATTORNEY

In the Court of KPK Service Tribunal Peshawar

Muhammad Ali Saem

} For
} Plaintiff
} Appellant
} Petitioner
} Complainant

VERSUS

Govt of KPK Ed

} Defendant
} Respondent
} Accused
}

Appeal/Revision/Suit/Application/Petition/Case No. _____ of _____
Fixed for _____

I/We, the undersigned, do hereby nominate and appoint

IJAZ ANWAR ADVOCATE, SUPREME COURT OF PAKISTAN

Sajid Anwar my true and lawful attorney, for me in my same and on my behalf to appear at Pesh to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromises or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or subpoena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at Pesh the _____ day to _____ the year _____

Executant/Executants _____
Accepted subject to the terms regarding fee _____

Accepted

Sajid Anwar
Advocate, Peshawar

Ijaz Anwar

Advocate High Courts & Supreme Court of Pakistan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR.

Service Appeal No. 790/2015

Khalid Naseem Khan.....(Appellant)

Versus

Govt of Khyber Pakhtunkhwa through Chief Secretary Khyber
Pakhtunkhwa Peshawar and others.....(Respondents)

Subject:- COMMENTS ON BEHALF OF RESPONDENTS.

Respectfully Sheweth!

- a) The appeal has not been based on facts.
- b) The appeal is not maintainable in the present form.
- c) The appeal is bad for mis-joinder and non-joinder of necessary parties.
- d) The appellant is estopped to file the appeal.
- e) The appeal is barred by law and limitation.
- f) The appellant has not come to the Honorable Tribunal with clean hands.

FACTS:-

1. Needs no comments, as this Para pertains to the service record of appellant.
2. Incorrect, appellant while posted as District Police Officer Shangla made illegal recruitment of Special Police officers. The recruitments were made without adhering to the instructions issued by CPO vides No. 1195-1211/E-IV dated 03.04.2014. He made the recruitment in access to the available vacancies and also recruited persons who were not fulfilling the prescribed criteria. Therefore, he was proceeded

against departmentally and impugned penalty of compulsorily retirement from service was imposed on him. Copy of the instruction is enclosed as Annexure-A.

3. Incorrect, appellant made the recruitment against merit policy. According to the instructions issued vide memo No. 1195-1211/E-IV dated 03.04.2014, Regional Police Officer will constitute a committee for recruitment of Special Police officer under his command and concerned District Police Officer and one Superintendent of Police of the Region will be members of the committee. Appellant while posted as District Police Officer Shangla recruited Special Police officers without constitution of a committee as provided in the above referred instructions. He also made the recruitment against the merit policy.
4. Incorrect, the recruitment under review was made against the merit policy and instructions on the subject matter. Appellant neither adhered to the patent instructions nor maintained transparency. He made recruitment in access to the available vacancies, also some of the candidates were not fulfilling the prescribed physical standard required for appointment of Special Police officer.
5. Correct to the extent that show cause notice and grounds of action based on charges of making illegal recruitment of Special Police officer was issued to appellant and he submitted reply which was not found satisfactory. He was directed to appear before the Regional Police Officer Malakand for defense of the charges. The enquiry officer reported that the charges leveled against appellant were proved. Copy of the report is enclosed as Annexure-B.
6. Incorrect, appellant was directed to appear before Regional Police Officer Malakand for defense of the charges leveled against him but he failed to submit plausible explanation in rebuttal of the charges.

Enquiry officer reported that the charges were proved. Therefore, the impugned order was passed.

7. Correct to the extent that appellant submitted review petition which was under consideration and in the meanwhile notice of the Service Appeal was received therefore, respondents were not competent to proceed further into the matter.

GROUNDS:-

- A. Incorrect, appellant was treated in accordance with law and rules. Show cause and grounds of action were served on him. He was also directed to appear before Regional Police Officer Malakand for defending the charges. He failed to rebut the charges leveled against him therefore the impugned order was correctly passed.
- B. Incorrect, appellant made recruitment against the patent instructions on the subject matter. No committee was constituted for recruitment of the Special Police officer. The recruitments were made in access to the available vacancies and some of the candidates were not fulfilling the prescribed physical standard. Furthermore, he issued appointment order of 13 candidates on 06.02.2015 while he was transferred vide order dated 04.02.2015. According to the report of Regional Police Officer Malakand the charges of illegal appointment of Special Police officer were proved against appellant.
- C. Incorrect, District Police Officer is appointing authority for Special Police officers, however, in order to ensure transparency and fairness in recruitment, clear instructions were issued for making recruitment through committee headed by Regional Police Officer while appellant made the recruitment without constituting a committee. He also recruited candidates who were not fulfilling the prescribed physical standard and recruitments were made in access to the available vacancies.

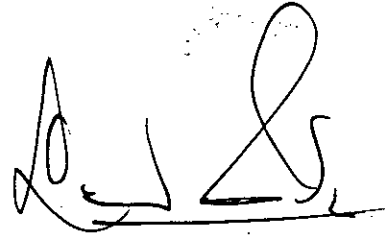
- D. Incorrect, show cause notice and grounds of action based on allegations of making illegal recruitment of Special Police officer was served on appellant. Regional Police Officer Malakand was asked to make enquiry into the charges leveled against appellant. Appellant was also directed to appear before his office. The enquiry officer reported that the charges were proved against the appellant. Therefore, the impugned order was passed.
- E. Incorrect, appellant made recruitment of Special Police officer against the merit policy and instructions issued by CPO on the subject matter. He made recruitment in access to the available vacancies. Several candidates were not fulfilling the required physical standard. He issued appointment order of 13 candidates after his transfer order.
- F. Incorrect, show cause notice and grounds of action were served on appellant. The appointments of Special Police officers were made against the merit policy. Patent illegality in appointments of the Special Police officers were proved from the record. Therefore, the impugned order was correctly issued.
- G. Incorrect, the beneficiary of illegal appointment order never come forward to depose against the appointing authority. Furthermore, sufficient evidence in support of charges of making illegal appointment was available therefore the elders of the locality were not examined.
- H. Incorrect, appellant made the recruitment without committee. Recruitments were made in access to the available vacancies. Several candidates were not fulfilling the physical standard. He also issued appointment order of 13 candidates after his posting order.
- I. Incorrect, the charges leveled against appellant were proved from the record.
- J. Incorrect, the impugned order is just, legal and speaking one. The order was passed in accordance with law and rules on the subject matter.

- K. Incorrect, the impugned order has been based on sound reasons and grounds and suffer from no legal infirmity.
- L. That the respondents may also be allowed to raise other grounds during hearing of the case.

It is therefore, prayed that the appeal may be dismissed with costs.



Chief Secretary
Civil Secretariat
Khyber Pakhtunkhwa
Peshawar
(Respondent No.1)



Inspector General of Police
Khyber Pakhtunkhwa,
Peshawar. 2/8/15.
(Respondent No.2)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No. 790/2015

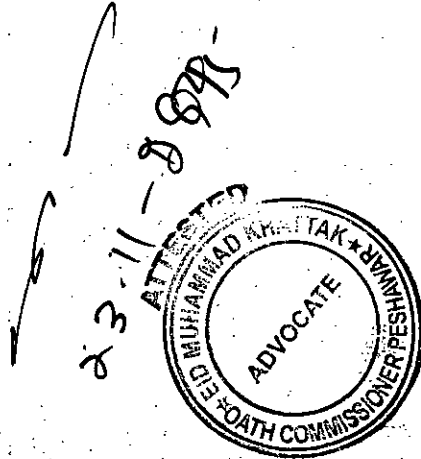
Khalid Naseem Khan.....(Appellant)

Versus

Govt of Khyber Pakhtunkhwa through Chief Secretary Khyber
Pakhtunkhwa Peshawar and others.....(Respondents)

AFFIDAVIT

I, Falak Nawaz DSP Legal CPO, Peshawar do here by
solemnly affirm on oath that the contents of accompanying comments on
behalf of respondents are correct to the best my knowledge and belief.
Nothing has been concealed from this Honorable Tribunal.



DEPONENT

Falak Nawaz,
DSP/Legal
14203-2060203-5

From: The Provincial Police officer,
Khyber Pakhtunkhwa, Peshawar.

To: The Regional Police Officers,
Hazara, Malakand, Mardan,
Kohat & DIKhan.

2. The Deputy Inspector General of Police,
DCT, Khyber Pakhtunkhwa, Peshawar.

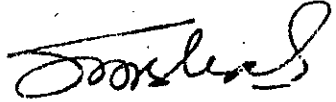
The District Police Officers,
Abbottabad, Haripur, Kohistan, Torghar,
Charsadda, Buner Chitral, Dir Lower,
Dir Upper, Hangu, DIKhan.

No. 1195-1211 /E-IV dated 03/04/2014.

Subject:- **DISTRIBUTION OF SPECIAL POLICE FORCE STRENGTH**

The Government of Khyber Pakhtunkhwa has given two years extension to Special Police Force for the period from 1st January 2014 to 31st December 2015.

2. The distribution of strength is given as per attached proforma.
3. The RPOs/DPOs can make recruitment against the vacant seats as per laid down criteria given in standing order No. 01/2008. For recruitment of Special Police, a Recruitment Committee shall be constituted by the RPOs headed by RPO himself and comprising concerned DPO and another SP from the Range as members.
4. The RPOs to personally supervise the recruitment of Special Police Force and will be responsible to ensure transparency and merit.

o/c

(SYED FIDA HASSAN SHAH)
AIG/Establishment,
For Provincial Police officer,
Khyber Pakhtunkhwa, Peshawar.

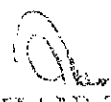
No. 12-12-14 /E-IV. Date = 3/04/2014.

Copy to the:-

1. Addl: IGP/HQrs, Khyber Pakhtunkhwa, Peshawar.
2. DIG/HQrs Khyber Pakhtunkhwa, Peshawar.
3. PSO to IGP, Khyber Pakhtunkhwa, Peshawar.

26-SPOs were recruited by Ex-District Police Officer, Shangla Mr. Khalid Naseem from 21/01/2015 to 06/02/2015 in a non-transparent manner without following the prescribed procedure set by the Central Police Office.

- (ii) No merit or competitive process was followed. It is clear that the recruitment was carried out to favour some politicians and personal friends.
- (iii) Out of 26 SPOs recruited, 04 do not meet the required physical standard.
- (iv) 13 recruited SPOs were issued belt numbers, while 13 were not even issued belt numbers.
- (v) 13 SPOs were recruited on 06 February 2015, although transfer order of Mr. Khalid Naseem was issued on 04 February, 2015.
- (vi) According to the statement of Pay Officer Shangla out of 800 sanctioned seats of SPOs in the District, 786 personnel drew their pay in the month of January 2015, which indicates that 14 seats of SPOs were vacant in the month of January. Against this 26 SPOs were recruited from 21st January 2015 to 6th February 2015.
- (vii) Two SPOs (Amirullah and Yousaf Khan) have been re-instated while they were dismissed from the same force during election 2013 on account of their involvement in politics.
- (viii) Record of SPF branch was not maintained properly and SPF Clerk Junior Clerk Fakhri Alam during the enquiry failed to indicate correct numbers of vacancies available in the District. His figures did not match the figures given by the pay officer.
- (ix) As a result of the enquiry the charges of illegal appointment against DSP Khalid Naseem, Ex-District Police Officer, Shangla and Junior Clerk Fakhri Alam stand proved.


(MAZAD KHAN) TSI, PSP
Regional Police Officer,
Malakand, at Saidu Sharif Swat
Naqi

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No. 520 /ST

Dated 1 / 4 / 2016


To

The I.G.P,
Peshawar.

Subject: - **JUDGMENT**

I am directed to forward herewith a certified copy of Judgement dated 25.3.2016 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.