

FORM OF ORDERSHEET

Application No. 233/2024

Order in other proceedings with signature of judge

3

The Misc. application in Service appeal No. 224/2024 submitted today by Mr. Abbas Ali Bangish. It is fixed for hearing before the Worthy Chairman at Peshawar on \_\_\_\_\_. Original file be requisitioned. Applicant be informed accordingly.

  
REGISTRAR

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COURT PETITION

BEFORE THE HONORABLE KPK SERVICE TRIBUNAL, PESHAWAR

Miscellaneous Application ~~dated~~ NO. 233/2024

In  
Service Appeal No. 224/24 (~~connected to Service Appeal No-1273/2017~~) instituted by  
Maisam Ali

Abbas Ali Bangash s/o Capt Ali Muhammad Bangash (deceased) --- Petitioner-In-Person

VS

Ex Constable Maisam Ali s/o Riaz Ali ----- Respondent No-1

Inspector General of Police & Others ----- Respondent No-2

Inspector General of Police & Others ----- Respondent No-3

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19.03.2024  
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Dated : 12 March 2024

Petitioner-In-Person

  
(Abbas Ali Bangash)

COURT PETITION

BEFORE THE HONORABLE KPK SERVICE TRIBUNAL, PESHAWAR

MISC. APPLI no. 233/2024

Khyber Pakhtunkhwa  
Service Tribunal

Miscellaneous Application dated 12 March 2024

Diary No. 11727

In  
Service Appeal No-224/2024 (~~connected to Service Appeal No-1273/2017~~) instituted by  
Maisam Ali

Dated 12-03-2024

Abbas Ali Bangash s/o Capt Ali Muhammad Bangash (deceased) - Usterzai Payan, Kohat-  
----- Petitioner-In-Person

VS

Ex Constable Maisam Ali s/o Riaz Ali (Usterzai Payan, Kohat) ----- Respondent No-1  
Inspector General of Police KPK (CPO Peshawar) ----- Respondent No-2  
DPO Kohat (DPO Office, Kohat) ----- Respondent No-3

Facts & Grounds of the Petition

Respectively Sheweth! I would like to submit following :-

1. That, so far, Maisam Ali has instituted following Service Appeals/petitions before Honorable KPK Service Tribunal, Peshawar :-

Ser	Service Appeals	Details	Page#
a.	Service Appeal No-1273/2017, instituted on 15/11/2017	Against 1 <sup>st</sup> Dismissal Order .However, Meisam Ali was again dismissed from Police on 24/11/202 for his conviction in FIR-80.	9-18
b.	Service Appeal for Ex Order - EP#55 /2024, instituted on 09/1/2024	For claiming back Date benefits, as affixed on 12/3/24 & pending. Connected to 1 <sup>st</sup> Dismissal Order Order No-OB-426 dated 04/5/17 for his involvement in FIR#37	19-29
c.	Service Appeal No-224/2024, instituted on 19/1/2024	Against 2 <sup>nd</sup> Dismissal Order , affixed on 18/3/24 & pending for his involvement in FIR#80	30-38

2. That, No-963/1192; Ex Police Constable Meisam Ali s/o Riaz Ali (Dismissed from Police service) has a criminal record/history of misusing/exploiting the cover of

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prestigious Police uniform during his employment/deployment at Kohat Police & particularly at Police Station Usterzai, Kohat, in terms of his involvement into brutal murder of a senior army veteran namely Capt Ali Muhammad Bangash vide FIR-80 (u/s 302/34/109 PPC) dated 24 Mar 2013 (my father) & a feeble lady namely Hina Shahnawaz vide FIR-37 (u/s 302/34 PPC) dated 06 Feb 2017 (Honor Killing case). Maisam Ali hails from a criminal family, with countless criminal FIRs registered against him & his family members. Details of FIRs are as under - *My Application to all is attached on Page 95.*

a. Details of FIR-80 (u/s 302/34/109 PPC) dated 24 March 2013 lodged at Police Station Usterzai, Kohat.

- (1) FIR#80 was registered by myself as a Complainant for the brutal murder of my father namely Capt Ali Muhammad Bangash (a retired army officer/veteran). **Copy is attached on Page 39-41.**
- (2) Maisam Ali was charged for the murder of Capt Ali Muhammad Bangash (deceased) vide my CrPC-164 statement. **Copy is attached on Page 41.**
- (3) 1<sup>st</sup> Suspension Order. That, Maisam Ali was suspended from service by Deputy Commandant KPK Police vide letter no - 4943-48/EF dated 03/4/13 has suspended Maisam Ali for his involvement in FIR#80. **Copy is attached on Page 54.**
- (4) That, later trial of case FIR#80 had been transferred from the Court of Session Judge Kohat to Court of Session Judge Peshawar by Honorable Peshawar High Court, Peshawar vide their Order dated 14 March 2014 on CMTA -53 /2013 for the security of Complainant & female Eye Witnesses. **Copy is attached on Page 42-44.**
- (5) 2<sup>nd</sup> Suspension Order. That, Meisam Ali was again suspended from service by AIG Establishment Police vide 2<sup>nd</sup> Suspension Order No-1950-52 dated 16/2/2016 for his involvement in FIR#80. **Copy is attached on Page 55.**
- (6) That, trial in case FIR#80 was conducted at Session Courts Peshawar, wherein on 13 Oct 2020 ,Meisam Ali was convicted. As per statement of PWs and particularly by DW-3 namely Atif Naeem, Madad

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Moharrar PS Usterzai Kohat has categorically stated that Meisam Ali was missing from the duty at PS Usterzai Kohat at 19:30 hrs 23 March 13 , the time of occurrence also recorded by Complainant in FIR#80. Copy is attached on Page 50-51

- (7) **2<sup>nd</sup> Dismissal Order.** That, upon his conviction in Case FIR-80(u/s 302/34/109 PPC) dated 24 March 2013, DPO Kohat vide his Order - OB No- OB No-830 /5901-04 dated 24 November 2020 has issued Dismissal Order against Meisam Ali after conduct of thorough inquiry and issuance of Charge Sheet & Summary of Allegations to Meisam Ali to which he proffered no response. Copy is attached on Page 53.
- (8) That, Maisam Ali & other co-accused had filed an Appeal against their conviction before Honorable Peshawar High Court Peshawar in 2020, which was affixed on 28/2/24. Honorable Peshawar High Court Peshawar had not admitted the appeal, rather by disposing off the appeal, remanded the same to Session Judge Peshawar for making corrections of a minor anomaly; with regards to recording of triplicate copies of statements of all DWs against 3 x accused in its Order dated 28/2/23. Maisam Ali has falsely stated that his appeal was admitted by the Honorable Peshawar High Court, rather the case was remanded over a minor anomaly. **(Copies are attached with Appeal for Executive Order #EP-55 & Service Appeal No-224/2024)**
- (9) That, Maisam Ali & Co-accused were acquitted by the Court of Session Judge Peshawar vide his Order dated 16/9/23, on the same set of evidence as recorded earlier, without an iota of change in evidence, despite that Honorable Peshawar High Court has remanded the case over a minor anomaly of getting triplicate copies of the statements of all DWs. **(Copy is attached with Appeal for Executive Order #EP-55 & Service Appeal No-224/2024)**
- (10) That, Complainant namely Abbas Ali Bangash having felt aggrieved by the Order of Court of Session Judge Peshawar dated 16/9/23,

**COURT PETITION**

accordingly filed a Criminal Appeal No-1398 against the acquittal of Maisam Ali and other co-accused on 03 Oct 2023 in Peshawar High Court Peshawar (Copy of the Institution slip dated 03 Oct 23 for filing Criminal Appeal No-1398 against acquittal is attached on Page 56 ). Honorable Peshawar High Court Peshawar vide Order dated 15 Feb 2024, has admitted the appeal with following order: *“the accused were acquitted on the charge on the same set of evidence. After hearing the learned counsel for the appellant, we are of the view that the case requires re-appraisal of evidence. Admit & Notice Bailable warrants of arrest in the sum of Rs 50,000/- with two sureties each in the like amount Bonds be issued against the accused/respondents to the satisfaction of Additional Registrar Judicial of this court. (Copy of the Order of Peshawar High Court Peshawar dated 15 /2/24 on Criminal Appeal No-13988 against acquittal is attached on Page 57-59 ).* This order inherently means that previous Order of Session Judge Peshawar dated 16/9/23 has been declared as Impugned /suspended. Conviction of Maisam Ali & other co-accused is now obvious/certain, after re-appraisal of evidence; hence he cannot be re-instated as case is under review by the Honorable High Court Peshawar.

b. **Details of FIR-37 (u/s 302/34 PPC) dated 06 Feb 2017 at Police Station Usterzai Kohat - The Honor killing/Brutal Murder of a lady named Mst Hina Shahnawaz.**

- (1) That, FIR#37 (u/s 302/34 PPC) dated 06 Feb 17 was registered at Police Station Usterzai, Kohat ; wherein Meisam Ali was charged for the brutal murder/Honor killing of Hina Shahnawaz by Complainant namely Farheen. Copy is attached as on Page 45
- (2) That, vide CrPC-164 Statement of Complainant in FIR#37, Meisam Ali was also charged for the murder of Mst Hina Shahnawaz. Copy is attached on Page 46-48

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(3) 1<sup>st</sup> Dismissal Order. Meisam Ali was dismissed from Police Service vide DPO Kohat Dismissal Order No-OB-426 dated 04/5/17 for his involvement in FIR#37. **Copy is attached on Page 52**

3. Details of Dismissal Orders, so far issued against Maisam Ali are as under:-

Ser	Details of Dismissal Orders	Brief Details
a.	1 <sup>st</sup> Dismissal Order No-OB-426 dated 04 May 2017	It was issued by DPO Kohat for his involvement in the murder of Hina Shahnawaz vide FIR-37(302/34PPC) dated 06 Feb 2017. In this connection Meisam Ali had filed Service Appeal No-1273/2017 & EP-55 for implementation of Executive Order.
b.	2 <sup>nd</sup> Dismissal Order by DPO Kohat OB No-830 /5901-04 dated 24 November 2020	It was issued by DPO Kohat upon his conviction in Case FIR-80(u/s 302/34/109 PPC) dated 24 March 2013. In this connection Meisam Ali has filed Service Appeal No-224/2024 before KPK Service Tribunal, which is pending till date.

4. That, trial of Co-Accused Mazhar Ali s/o Nadar Ali (uncle of Maisam Ali) directly charged in FIR#80, has been transferred from Kohat to Peshawar by Honorable Chief Justice Peshawar High Court Peshawar vide his Order dated 12 Jan 2024 on Cr Misc Transfer Application No-84-P/2023 due to life threats extended to myself and my family members by Maisam Ali & other co-accused. Accused Mazhar Ali remained an absconder for about 11 x years & now in judicial custody at Central Prison Peshawar. There is a strong possibility of coming forth countless incriminating evidences against Maisam Ali during trial of Accused Mazhar Ali. **Copy is attached on Page# 57-69. Criminal history 75**

5. Prayer. Keeping in view the above stated facts, the gross misconduct of Maisam Ali in terms of commission of 2 x murders by exploiting/misusing the Police uniform & in the light of existing laws & rules; his Service Appeals are void of merit & any substance; hence following is respectfully prayed in this regard :-

- a. Through a Court Order Sheet, permission may please be granted for proper institution of this miscellaneous Application by recognizing/admitting me as a potential Respondent in Service Appeal No- EP-55 & Service Appeal No- 224/2024, as instituted by Maisam Ali. **Being a direct affectee/victim of brutality/criminality of Ex Police Constable Maisam Ali, I would be able**

COURT PETITION



*to assist this Honorable Service Tribunal about exact facts, which Maisam Ali has been hiding in his 3 x Service Appeals.*

- b. Through a Court Order Sheet, the facts highlighted & documents attached in this Miscellaneous Application may please be placed/brought on the record of Service Appeal for Executive Order No-EP-55 dated 09/1/2024 & Service Appeal No-224/2024 instituted on 19/1/2024.
- c. Service Appeal No- EP-55 as instituted by Maisam Ali for securing his back date benefits may please be dismissed as the case is still under judicial review by the Honorable Peshawar High Court Peshawar, as evident from its Order dated 15/2/24 on Criminal Appeal No-1398 against acquittal of Maisam Ali & others. He committed the murder of Capt Ali Muhammad Bangash (deceased) on 23 March 2013 vide FIR#80 , hence he is not entitled for any back date benefit.
- d. Service Appeal No-224/2024 as filed by Meisam Ali may be dismissed as the case is still under judicial review by the Honorable Peshawar High Court Peshawar as evident from its Order dated 15/2/24 on Criminal Appeal No-1398 filed by the Complainant against acquittal of Maisam Ali.
- e. Maisam Ali has a criminal history, hence his reinstatement into Department of KPK Police would pose enormous security threats to myself, 17 x PWs in the ongoing trial of his uncle Accused Mazhar Ali , particularly 2 x Female Eye Witnesses (my sisters) & people of the area as he has committed 2 x murders in the jurisdiction area of Police Station Usterzai, Kohat. His re-instatement may potentially lead to further heinous offences/crimes by him in the area, under the garb of Police uniform. It is also the question of public safety against the criminal mindset of Maisam Ali.

Petitioner-In-Person

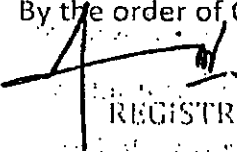
  
(Abbas Ali Bangash)

Dated : 12 March 2024

Form-A  
FORM OF ORDER SHEET

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

Implementation Petition No. 55 /2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	09.01.2024	<p>The implementation petition of Mr. Mehsam Ali submitted today by Mr. Hassan U.K Afridi Advocate. It is fixed for implementation report before Single Bench at Peshawar on _____. Original file be requisitioned. AAG has noted the next date. Parcha Peshi is given to the counsel for the petitioner.</p> <p style="text-align: right;">By the order of Chairman    REGISTRAR</p>

## KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Case Title: Mehsana Ali CHECK LIST v/s LGP KPK

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: _____	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly pagged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✗	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	✗	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974, Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26	Whether copies of comments/reply/rejoinder submitted? On _____	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____	✓	

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Hassan U/K Asad

Signature: \_\_\_\_\_

Dated: 9-1-2024

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

Execution petition No. 55 /2024

In

Service Appeal No.1273/2017

Mehsam Ali S/o Raiz Ali,  
R/o Ustarzai, Kohat (Constable No.1192)

.....Appellant/Applicant

**V E R S U S**

Inspector General of Police, Khyber Pakhtunkhwa,  
Peshawar & others.....Respondents

**I N D E X**

S#	Description of Documents	Annex	Pages
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9.	Judgment of Session Judge Peshawar dated 16.09.2023	G	59-88
10.	Wakalatnama		87

Through Appellant

Dated 09.01.2024

**Hassan U.K Afridi**  
Advocate Supreme Court  
Cell No.0300-9151963

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

Execution petition No. 55/2024  
In Service Appeal No.1273/2017

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 10454

Dated 09-1-2024

Mehsam Ali S/o Raiz Ali,  
R/o Ustarzai, Kohat (Constable No.1192)  
District Police Kohat.....Appellant/Applicant

**V E R S U S**

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
2. Deputy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
3. District Police Officer, Kohat.....Respondents

**APPLICATION FOR IMPLEMENTATION/  
COMPLIANCE OF JUDGMENT/ORDER OF  
THIS HON'BLE TRIBUNAL VIDE DATED  
01.07.2020**

**Respectfully Sheweth:-**

1. That the applicant/appellant has filed service Appeal before this Hon'ble Tribunal, which was decided in favour of applicant vide judgment dated 01.07.2020. **(Copy of judgment is attached).**
2. That the applicant/appellant was reinstated but the intervening period has treated as un-authorized

leave without pay, which is without jurisdiction and illegal.

3. That the applicant/appellant then filed application for compliance of the order of this Hon'ble Tribunal but in vain.
4. That the respondent turn deaf ear and not interested to implement the judgment of this Hon'ble Tribunal.
5. That some other ground may be adduced at the time of arguments with the permission of this Honourable Court.

It is, therefore most humbly prayed that on acceptance of this application the respondents may kindly be directed to implement the judgment dated 01.07.2020 of this Hon'ble Tribunal and awarded the back benefit from 05.04.2017 to 27.07.2020.

*Masam Ali*

Appellant

Through

*Hassan U.K Afridi*

Advocate Supreme Court

Dated 09.01.2024

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

Execution petition No. \_\_\_\_\_/2024

In

Service Appeal No.1273/2017

Mehsam Ali S/o Raiz Ali,  
R/o Ustarzai, Kohat (Constable No.1192)

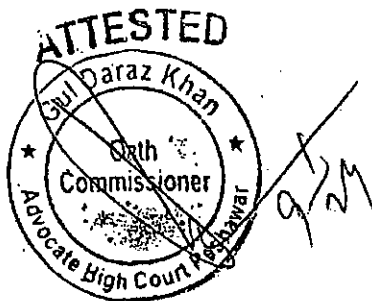
.....**Appellant/Applicant**

**VERSUS**

Inspector General of Police, Khyber Pakhtunkhwa,  
Peshawar & others.....**Respondents**

**AFFIDAVIT**

I, Mehsam Ali S/o Raiz Ali, R/o Ustarzai, Kohat  
(Constable No.1192), do hereby solemnly affirm and  
declare on oath that the contents of the accompanying  
**Execution petition** are true and correct to the best of my  
knowledge and belief and nothing has been concealed  
from this Hon'ble Court.



*Mehsam Ali*  
**DEPONENT**

9/ 15

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

C.M.No. \_\_\_\_\_/2024  
in Execution petition No. \_\_\_\_\_/2024  
In  
Service Appeal No.1273/2017

Mehsam Ali S/o Raiz Ali,  
R/o Ustarzai, Kohat (Constable No.1192)  
.....Appellant/Applicant.

**V E R S U S**

Inspector General of Police, Khyber Pakhtunkhwa,  
Peshawar & others.....Respondents

**APPLICATION FOR CONDONATION OF**

**DELAY IF ANY**

**Respectfully Sheweth:-**

1. That the execution petition has being filed before this Hon'ble Tribunal with the present application, which has bright chance to succeed.
2. That the appellant/applicant was behind the bar in one criminal case from 13.10.2020 till 28.02.2023 for the reason, the present execution petitioner has been filed after three years.
3. That the delay to file execution petition is not intentional.
4. That there is no legal bar in the way, for execution/ compliance of the judgment of Hon'ble Tribunal.



5. That some other ground may be adduced at the time of arguments with the permission of this Honourable Court.

It is therefore humbly prayed that on acceptance of this application, the delay to file execution petition, if any, may kindly be ordered to condone.

*M Ram Ali*

Appellant

Through

**Hassan U.K Afridi**

Advocate Supreme Court

Dated 09.01.2024

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

C.M No. \_\_\_\_\_/2024  
in Execution petition No. \_\_\_\_\_/2024  
In  
Service Appeal No.1273/2017

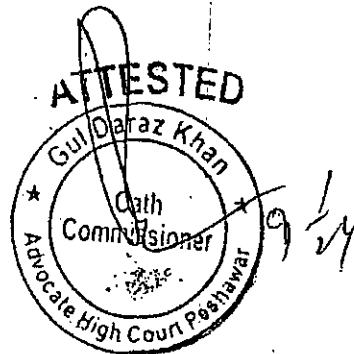
Mehsam Ali S/o Raiz Ali,  
R/o Ustarzai, Kohat (Constable No.1192)  
.....Appellant/Applicant

**V E R S U S**

Inspector General of Police, Khyber Pakhtunkhwa,  
Peshawar & others.....Respondents

**A F F I D A V I T**

I, Mehsum Ali S/o Raiz Ali, R/o Ustarzai, Kohat  
(Constable No.1192), do hereby solemnly affirm and  
declare on oath that the contents of the accompanying  
**condonation of delay** are true and correct to the best of  
my knowledge and belief and nothing has been  
concealed from this Hon'ble Court.



*Mehsum Ali*  
**DEPONENT**



Ans 18

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

Service Appeal No. 1273/2017

Khyber Pakhtunkhwa  
Service Tribunal

Entry No. 1313

Dated 15-11-2017

Mehsam Ali S/o Raiz Ali,  
R/o Ustarzai, Kohat (Constable No.1192).....Appellant

**VERSUS**

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
2. Deputy Inspector General of Police, Kohat
3. District Police Officer, Kohat..... Respondents

APPEAL UNDER SECTION 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT,  
1974, AGAINST THE IMPUGNED ORDER OF  
DISMISSAL OF THE APPELLANT FROM  
SERVICE OF THE RESPONDENT NO.3  
DATED 04.05.2017, WHEREBY THE  
REPRESENTATION/DEPARTMENTAL APPEAL  
OF THE APPELLANT WAS UNANSWERED,  
AND REVISION FILED BY THE APPELLANT,  
VERBALLY REJECTED ON 18.10.2017  
WHICH ARE AGAINST LAW AND JUSTICE  
AND LIABLE TO BE SET ASIDE.

Filed to-day  
Registrar  
15/11/17

**ATTSTED**

**ATTESTED**

*[Signature]*  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

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

Service Appeal No. 1273 /2017

Mehsam Ali.....Appellant

**V E R S U S**

Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar & others... Respondents

**I N D E X**

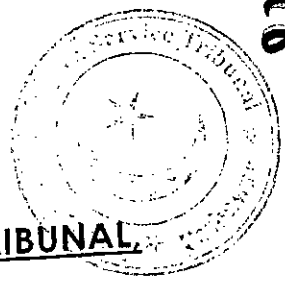
S#	Description of Documents	Annex	Pages
1.	Service Appeal with affidavit		1-7
2.	Application for condiation alongwith affidavit		8-10
3.	Addresses of parties		11
4.	Appointment order		12-13
5.	Copy of FIR		14-15
6.	Copy of 164 Statement		16-18
7.	Naqaal Mad 8, 21, 33		19-21
8.	Charge sheet, statement of allegation		22-23
9.	Reply to charge sheet		24
10.	Copy of impugned order dt.04.05.2017		25
11.	Departmental Appeal dt.16.05.2017		26-29
12.	Copy of revision dated 10.09.2017		30-31
13.	Appearance order of appellant dated 17.10.2017		32
14.	Affidavit of Imtiaz Ali		33-34
15.	Release of appellant on bail 05.04.2017		35-40
16.	Order of High Court in B.C.A		41-44
17.	Application for getting inquiry report		45
18.	Wakalatnama		46

Appellant

Through

Dated 15.110.2017

**Hassan U.K. Afridi**  
Advocate High Court  
Cell No.0300-9151963



20

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

Service Appeal No. 1273 /2017

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1313

Dated 15-11-2017

Mehsam Ali S/o Raiz Ali,  
R/o Ustarzai, Kohat (Constable No.1192).....Appellant

**VERSUS**

1. Inspector General of Police, Khyber Pakhtunkhwa,  
Peshawar
2. Deputy Inspector General of Police, Kohat
3. District Police Officer, Kohat.....Respondents

**APPEAL UNDER SECTION 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT,  
1974, AGAINST THE IMPUGNED ORDER OF  
DISMISSAL OF THE APPELLANT FROM  
SERVICE OF THE RESPONDENT NO.3  
DATED 04.05.2017, WHEREBY THE  
REPRESENTATION/DEPARTMENTAL APPEAL  
OF THE APPELLANT WAS UNANSWERED,  
AND REVISION FILED BY THE APPELLANT,  
VERBALLY REJECTED ON 18.10.2017  
WHICH ARE AGAINST LAW AND JUSTICE  
AND LIABLE TO BE SET ASIDE.,**

Filed to-day  
Registrar  
15/11/17

Certified true copy  
  
Registrar

**Prayer in Appeal:-**

On acceptance of this appeal, the impugned order vide dated 04.05.2017 passed by the respondent No.3, may kindly be set aside and the appellant may please be re-instated in service with all back benefit.

Any the relief, the Honourable Court may deem fit for the safe administration of justice

---

**Respectfully Sheweth:-**

**Facts of the case**

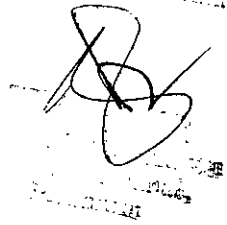
1. That the appellant was appointed as Constable in the police Department in District Kohat on 26.07.2007. (Copy of the Service card is attached).
2. That from the date of appointment, the appellant performed his duties well and to the entire satisfaction of the supervision.
3. That the record of the appellant is outstanding.

ATTESTED



4. That an FIR No.37, dated 06.02.2017 U/S 302 PPC has been lodged by the complainant, namely Mst. Farheen Shah, against the other persons, but later on in the statement u/s 164 of Cr.P.C dated 14.02.2017, the appellant has been charged by the some complaint.
5. That the appellant was locked in for quarter guard on 13.02.2017, and later on charge sheet has been issued to the appellant for the said offence, and without any regular and proper inquiry and without any show cause notice the appellant has been dismissed from the service on 04.05.2017. (Copy of the impugned order is attached).
6. That feeling aggrieved from the order of dismissal, vide dated 04.05.2017, the appellant filed departmental representation/appeal before the respondent No.2, on 16.05.2017 but this was unanswered. And on 10.09.2017, the appellant filed revision, and the appellant was called on 18.10.2017 and verbally denied the revision, hence the Service Appeal on the following amongst the other grounds:

ATTACHED

A handwritten signature in black ink is written over a rectangular stamp. The stamp contains some illegible text and a date, possibly '18/10/2017'. The signature is a stylized, cursive script.

**GRUNDS:**

- A. That the impugned order of dismissal vide dated 04.05.2017 is against law and justice and is liable to be set aside.
- B. That the appellant has not been dealt in accordance with law and rules.
- C. That the disciplinary proceedings initiated against the appellant is not according to law and rules.
- D. That no Show Cause Notice has been issued to the appellant.
- E. That the inquiry has not been conducted in accordance with law and the allegation leveled against the appellant have not been proved.
- F. That the appellant has not been charged in FIR , but later on he has been charged in the statement recorded u/s 164 of Cr.P.C, while the appellant has been released on bail, while the BCA filed by the complainant also dismissed.

**ATTESTED**

G. That the appellant has been charged on malafide and no connection/corroboration has been

  
[Signature]  
[Name]  
[Designation]  
[Address]

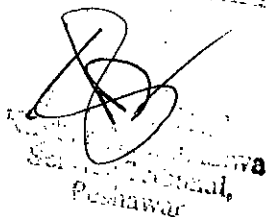


proved, of the appellant, with the commission of offence.

- H. That the appellant has been locked up in quarter guard on 13.02.2017, while, he has been charged on 14.02.2017, which clearly shows the malafide in the part of the respondents.
- I. That opportunity of defence has not been given to the appellant.
- J. That one eye witness in the FIR has given an affidavit, regarding the absence of appellant.
- K. That the appellant is innocent, and has been charged malafidely in the criminal case and also initiated disciplinary proceeding malafidely and without any proof, further that behind all these malafide actions one army person, also involved.
- L. That some other ground may be adduced at the time of arguments with the permission of this Honourable Court.

**It is, therefore most humbly prayed that On acceptance of this appeal, the impugned order**

APPROVED

  
Sd/-  
Peshawar

vide dated 04.05.2017 passed by the respondent No.3, may kindly be set aside and the appellant may please be re-instated in service with all back benefit.

Any the relief, the Honourable Court may deem fit for the safe administration of justice

*Ordon Ali*  
Appellant

Through

*Hassan U.K Afridi*  
Advocate High Court

Dated 15.11.2017

ATTESTED  
*[Signature]*  
Notary Public  
Sindh, Pakistan  
Pakistan

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

Service Appeal No. \_\_\_\_\_/2017

Mehsam Ali.....Appellant

**V E R S U S**

Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar & others... Respondents

**A F F I D A V I T**

I, Mehsum Ali S/o Raiz Ali, R/o Ustarzai, Kohat (Constable No.1192), do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Certified true copy  
Khyber Pakhtunkhwa  
Peshawar

*Mehsum Ali*  
**DEPONENT**

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

Service Appeal No. 1273 /2017

Mehsam Ali.....Appellant

**V E R S U S**

Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar & others... Respondents

**APPLICATION FOR CONDONATION OF**  
**DELAY**

**Respectfully Sheweth:**

1. That the appellant filed with this application the service appeal which has bright chance to succeed.
2. That the impugned order, passed on 04.05.2017 and departmental appeal filed on 16.05.2017, and when no reply of departmental appeal received to the appellant then he filed a revision, on 10.09.2017, and he was called on 18.10.2017, and verbally told to appellant that his revision has been rejected and hence filed the service appeal on 15.11.2017.
3. That even the impugned order is void as no Show Cause Notice has been issued so no limitation rules against void order.

**ATTESTED**



3.

- 4. That the case of the appellant is prima facie and having a bright chance to succeed.
- 5. That some other ground may be adduced at the time of arguments with the permission of this Honourable Court

It is, therefore humbly prayed that on acceptance of this application, the delay of filing the service appeal if any, may kindly be condoned,

*Dr. Am Ali*  
Appellant

Through

*Hassan U.K Afridi*  
Advocate High Court

Dated 15.11.2017

*[Signature]*  
Clerk of Court  
High Court

Date of Filing 28-3-18  
 Number of 3600  
 Copies 18  
 Urgency 2  
 Fee 20  
 Name of [Signature]  
 Date of 28-3-18  
 Date of 28-3-18

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

Service Appeal No. \_\_\_\_\_/2017

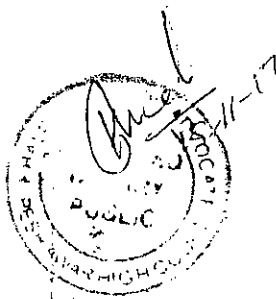
Mehsam Ali.....Appellant

**VERSUS**

Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar & others... Respondents

**AFFIDAVIT**

I, Mehsum Ali S/o Raiz Ali, R/o Ustarzai, Kohat (Constable No.1192), do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



*Mehsum Ali*  
**DEPONENT**

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

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 10676

Dated 19-1-2024

Service Appeal No. 224/2024

Maisam Ali Son of Riaz Ali  
R/o Ustarzai Payan, District Kohat  
Ex-Constable No.963, Kohat.....**Appellant**

**V E R S U S**

1. Inspector General of Police (I.G.P), Khyber Pakhtunkhwa, Peshawar
2. Deputy Inspector General of Police (D.I.G), Kohat Region Kohat (Regional Police Officer Kohat Region Kohat)
3. District Police Officer (D.P.O), Kohat  
.....**Respondents**

**SERVICE APPEAL UNDER SECTION 4 OF THE  
KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL ACT, 1974, AGAINST THE  
IMPUGNED ORDER VIDE DATED  
24.11.2020 PASSED BY THE RESPONDENT  
NO.3 WHEREBY THE APPEAL FILED BY THE  
APPELLANT BEFORE THE RESPONDENT  
NO.2 DISMISSED ON 22.12.2023, WHILE  
BOTH THE IMPUGNED ORDERS AS  
MENTIONED ABOVE ARE AGAINST LAW  
AND LIABLE TO BE SET ASIDE.**

**Prayer in Appeal:-**

On acceptance of this service appeal, the impugned order passed by the respondent No.3 vide dated 24.11.2020 and impugned order passed by the respondent No.2 vide dated 22.12.2023 may kindly be set aside and the appellant please be reinstated in service with all back benefits.

Any other relief, deemed fit and necessary in the given circumstances of the case may also be awarded in favour of the appellant was against respondents

**Respectfully Sheweth:-**

Facts of the case

1. That the appellant was appointed as Constable in the police department in District Kohat on 26.07.2007.
2. That from the date of appointment, the appellant performed his duty well and to the entire satisfaction of the authorities.



3. That the appellant was charged in the FIR No.80, dated 24.03.2013, charged under section 302, 109, 34, PPC of Police Station Ustarzai District Kohat.
4. That the charge sheet and statement of allegations have been served to the appellant due to the said criminal case, on 12.04.2013 and after that inquiry was also conducted and according to the finding of inquiry "from the inquiry so far conducted and keeping in view the stage of trial of the instant case, it would be the fitness of things that the decision of the case by Hon'ble Court of law to meet the ends of justice once for all and properly.
5. That the appellant was also suspended due to the above case, vide dated 03.04.2013, but later on the appellant was reinstated vide dated 17.10.2014 and the appellant performed his duty but all of the sudden the appellant again suspended vide dated 16.02.2016 till now.

~~33~~

6. That the trial of criminal case was commenced and the appellant after conclusion of trial, convicted U/S 302 (b) and sentenced to imprisonment for life by the Session Judge, Peshawar vide order dated 13.10.2020.
7. That the appellant filed appeal before the Peshawar High Court Peshawar which was allowed vide dated 28.02.2023 and the case was remanded for fresh decision and the appellant was released.
8. That the appellant then acquitted by the Session Judge, Peshawar vide order dated 16.09.2023.
9. That when the appellant was convicted then the re-inquiry was conducted, after serving charge sheet again to the appellant although the appellant was in jail, but the appellant has been dismissed from the service upon conviction vide dated 24.11.2020.
10. That when the appellant has acquitted from the charges levelled against him vide order dated 16.09.2023, then he filed departmental

appeal on 11.10.2023, which has been rejected on 22.12.2023 while the decision received by the appellant on 29.12.2013, hence this service appeal on the following amongst the other grounds:

**GRUNDS:**

- A. That the impugned order passed by the respondent No.3 vide dated 24.11.2020, and impugned order passed by the respondent No.2 vide dated 22.12.2023 are against the law and justice and are liable to be set aside.
- B. That the appellant has not been dealt in accordance with law and rules.
- C. That the disciplinary proceedings initiated against the appellant is not according to law and rules as laid down in service law.
- D. That inquiry was conducted in the year 2013 and according to that inquiry, the fate of the appellant was left over to the decision of the competent court of law.

- E. That the second inquiry was conducted in absence of the appellant, as the appellant was in jail and the appellant has been dismissed on the basis of conviction announced vide dated 13.10.2020, but later on the appellant acquitted from the charge levelled against him vide dated 16.09.2023 but instead of that the departmental appeal has dismissed vide dated 22.12.2023 by the respondent No.2, which is unbelievable and unjust.
- F. That no opportunity of defence has been given to the appellant, in second inquiry, while the second inquiry is against law /rules.
- G. That the second inquiry conducted in absence of the appellant because the appellant was in jail.
- H. That the appellant has acquitted from the above mentioned case, and according to the finding of inquiry officer in the year 2013, the

appellant is very much entitled for reinstatement with all back benefits.

- I. That the delay of filing departmental appeal is due to the prison of appellant in jail and further the appellant waited for the final decision of competent court of law and when the appellant acquitted on 16.09.2023 then he filed departmental appeal on 11.10.2023, because the appellant has been dismissed by the respondent No.3 on the basis of conviction vide dated 13.10.2022.
- J. That the appellant was suspended on 03.04.2023 due to the criminal case, but after inquiry he was reinstated on 17.10.2014, surprisingly he was again suspended on 16.02.2016 and such suspension order is still alive which is against law /rules.
- K. That some other ground may be adduced at the time of arguments with the permission of this Honourable Court.

It is, therefore most humbly prayed on acceptance of this service appeal, the impugned order passed by the respondent No.3 vide dated 24.11.2020 and impugned order passed by the respondent No.2 vide dated 22.12.2023 may kindly be set aside and the appellant ay please be remanded in service with all back benefits.

Any other relief, deemed fit and necessary in the given circumstances of the case may also be awarded in favour of the appellant was against respondents

Through Appellant

Dated 19.01.2024

  
Hassan U.K. Afridi  
Advocate  
Supreme Court of Pakistan

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

Service Appeal No. \_\_\_\_\_/2024

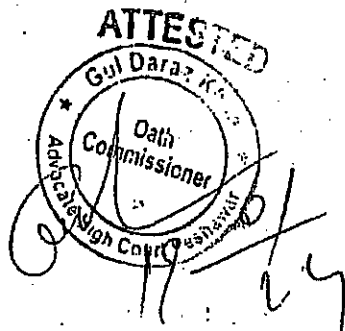
Maisam Ali.....Appellant

**VERSUS**

Inspector General of Police (I.G.P), Khyber Pakhtunkhwa,  
Peshawar & others.....Respondents

**AFFIDAVIT**

I, Maisam Ali Son of Riaz Ali R/o Ustarzai Payan, District Kohat Ex-Constable No.963, Kohat, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



*Maisam Ali*

**DEPONENT**

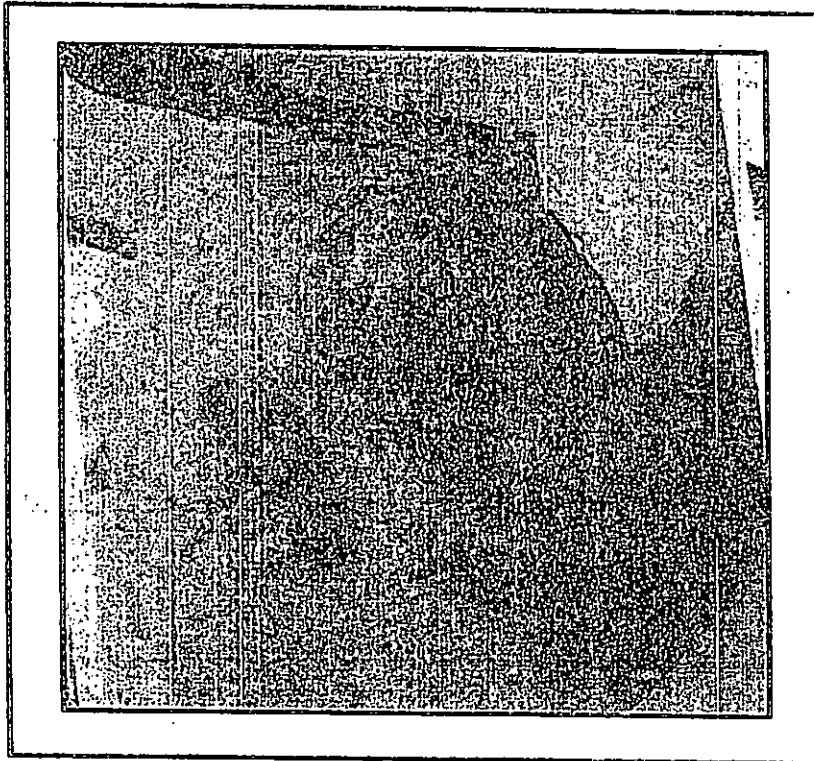




Extent of brutality of Accused Zulfiqar Ali alias Bhutto and his  
relatives

40

Brutal murder of Deceased - Captain Ali Muhammad Bangash (Retd),  
Pakistan Army



Shot 12 x bullets and a bullet in head

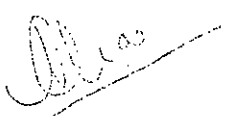


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Supplementary Statement of Major Abbas Ali Bangash s/o Ali Muhammad Bangash (deceased) aged about 36/37 years r/o Usterzal Puyan Kohat (complainant) u/s 164 Cr.P.C on oath.

Stated that in the FIR, I had charged Zulficar Ali alias Bhutto, Niaz Ali Mazhar Ali s/o Nadir Ali r/o Usterzal Puyan for the murder of my father Capt(R) Ali Muhammad Bangash. Through reliable/confirmed sources/information, I have come to know that Constable Maisam Ali of Elite Police Force also fired at my father. Constable Maisam Ali was seen present around the scene of murder of my father around 19.00 hours on 23<sup>rd</sup> March 2013 by number of people. In order to carry out thorough investigation of the case, it is requested that Constable Maisam Ali of Elite Force be arrested so that Police is able to investigate him. I also produce 3 x photocopies of the complaints of my father which he addressed to various officials/const with regards to the life threats given to him by Zulficar Ali alias Bhutto and his brothers. It will help to establish the cause and motive behind the murder of my father. 2 x photocopies of the court proceedings of the legal case on "Illegal occupation of the shanilat" by Zulficar Ali alias Bhutto is also enclosed. This is my statement.

RO&AC  
30.03.2013

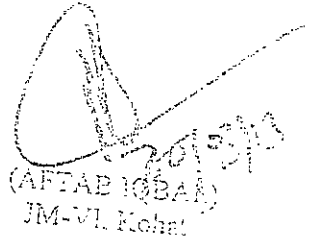


Major Abbas Ali Bangash  
CNIC No. 71103-1779702-1



JM-VI Kohat

Certified u/s 164 Cr.P.C.



JM-VI Kohat

JUDGMENT SHEET  
PESHAWAR HIGH COURT, PESHAWAR.  
JUDICIAL DEPARTMENT

C.M./T.A. No. 53 of 2013

JUDGMENT

Date of hearing 14-3-2014

Appellant Majid Abbas Ali Bangash Petitioner in Person.

Respondent Syed Muzakir Hussain Advocate for respondent.  
Majid Ahmad Khan AAG. For State.



MIAN FASIH-UL-MULK, CJ.- Through instant application, petitioner Major Abbas Ali Bangash seeks transfer of trial in case FIR No.80 dated 24.03.2013 under Section 302/34/109 PPC, Police Station Usterzai, Kohat from the Court of Sessions Judge Kohat to some other Court in the Province in view of imminent and serious threats to his life and lives of eyewitnesses.

2. As per contents of application, father of petitioner namely Captain Ali Muhammad Bangash was murdered for which accused Riaz Ali, Mazhar Ali, Meisam Ali and Zulfiqar Ali alias Bhutto were charged by petitioner/complainant. Motive was overshamat of deh, as father of petitioner had filed a civil suit in this regard. Petitioner is an Army Officer posted at GHQ Rawalpindi and has received various threats from the accused party for which

ATTESTED  
EXAMINER  
Peshawar High Cou  
79 NOV 2016



petitioner in writing informed the local police but no positive steps have been taken so far; hence life of petitioner and eyewitnesses would remain in danger if trial of the case is conducted at Kohat.

3. Arguments heard and record perused.
4. At page 44 of the file is a copy of complaint submitted to the Magistrate by deceased father of petitioner against accused wherein it was stated that the accused party is compelling him to withdraw the civil suit. At Page 45 are the bail bonds which the accused submitted under Section 107 Cr.P.C for keeping good behaviour. Despite that, father of petitioner was murdered and accused-party was charged for the same. Similarly, petitioner has in writing informed the high-ups of police and Government authorities about the threats given to him by accused party, copies whereof are available at Pages 46 to 64 of the file.

5. Learned AAG appearing on behalf of the State, keeping in view the above circumstances of the case, has expressed his no objection if trial in the case is conducted some where outside District Kohat.

6. Learned counsel for respondents though opposed the transfer of case but could not convince this Court regarding the

ATTESTED  
EXAMINER  
Peshawar High Cou  
19 NOV 2016

(12)

44

imminent threat to the life of complainant and female eyewitnesses especially in view of the history of case and documentary evidence available on file.

7. For the aforesaid reasons, this application is accepted and trial of the case is transferred from the Court of Sessions Judge, Kohat to the Court of Sessions Judge, Peshawar. The D.P.O Kohat is directed to ensure the safe travel of female eyewitnesses as and when required by the trial Court. The learned Sessions Judge, Peshawar is directed to conduct trial in the case on urgent basis.

Announced  
14.03.2014

*Sd/- Mirza Aslam Khan*  
CHIEF JUSTICE

**CERTIFIED TO BE TRUE COPY**  
EXAMINER  
Peshawar High Court, Peshawar  
Authorized Under Article 17 of  
The Governance of Punjab Order 1999  
19 NOV 2016

No. 6946

Date of Presentation of Application 27/10/16

No of Pages 15

Copying fee \_\_\_\_\_

Urgent Fee \_\_\_\_\_

Total 30-00

Date of Preparation of Copy 18/11/16

Date Given For Delivery 19/11/16

Date of Delivery of Copy 21/11/16

Received By [Signature]

انٹرنیٹ پولیس کو پریس ریلیز نمبر ۲۲

# ابتدائی اطلاع رپورٹ

نمبر ۲۲، ۱۱۵۰

۱۲۰۰ ۱۲۰۰ ۱۲۰۰  
۱۱۳۰۱-۲۳۱۲۹۴۱۰۰

کوئٹہ

(مقامی) ابتدائی اطلاع نسبت جرائم قابل دست اندازی پولیس رپورٹ شروع زیر نمبر ۱۵۲ مجموعہ منسلک قومی رپورٹ

منبع کوئٹہ

اسٹریٹی

تاریخ و وقت وقوعہ ۰۶/۱۷ ص ۱۷:۳۰ بجے

نمبر 37

تاریخ و وقت رپورٹ	۰۶/۱۷ ص ۱۷:۳۰ بجے
تاریخ و وقت وقوعہ	۰۶/۱۷ ص ۱۷:۳۰ بجے
نام و سکونت اطلاع دہندہ و متنبیث	جناب شاہ دیوبند حنیف عباس
مختصر کیفیت جرم (معرورہ) حال اگر کچھ یا گیا ہو	R 302
بہائے وقوعہ فاصلہ تھانہ سے اور سمت	خانہ داخلہ خانہ نمائندگی از اسٹریٹی بلدیہ خانیہ بلدیہ
نام و سکونت ملزم	۱۲۱۳۰۱۱۴۰۷۰۸۶۰۷ ۳۳۳۹۶۵۰۳۵۰ محبوب عالم خان عرفہ خالد شمالہ عالم خان
کارروائی پولیس کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہو تو وجہ بیان کرو۔	پوسٹل ڈیویژن کو رپورٹ دی جا رہی ہے
تھانہ سے روانگی کی تاریخ و وقت	دھوکہ سیٹل ڈیویژن

## ابتدائی اطلاع نیمہ درج کرو

ضروریات اس وقت ایک لاکھ ساتھیوں کے لئے ایک بڑی حد تک سختی اور جبری صورتحال پیدا ہو رہی ہے۔ اس وقت ایک لاکھ ساتھیوں کے لئے ایک بڑی حد تک سختی اور جبری صورتحال پیدا ہو رہی ہے۔ اس وقت ایک لاکھ ساتھیوں کے لئے ایک بڑی حد تک سختی اور جبری صورتحال پیدا ہو رہی ہے۔ اس وقت ایک لاکھ ساتھیوں کے لئے ایک بڑی حد تک سختی اور جبری صورتحال پیدا ہو رہی ہے۔

بیان شہداء زین العابدین علیہ السلام کے حوالے سے شہداء اور  
مقامی سطح پر 164 صفحے پر

ملف بیان کیا کہ مؤلف نے جلد سے جلد  
پری پری میں 2017/2/6 کو گزرا تھا اس کے بیان  
میں موجود تھی جیل میں اور ہر دلی پور میں موجود تھی

اور ہر ہفتہ صبح صبح صبح صبح صبح صبح صبح صبح صبح صبح صبح  
ام محبوب عالم ولد شاہ عالم گزریا اور صاحب عالم  
کہ جہاں شاہ عالم تھے آئے ہیں صبح صبح صبح صبح صبح صبح  
ہے۔ کہیں کر میں ہم ہفتہ صبح صبح صبح صبح صبح صبح

ان کے گزرنے کا بیان کیا کہ جہاں شاہ عالم کے ہمراہ معلم علی خان صاحب  
ولید علی، ماسون ریاضی علی، ماسون ذوالفقار علی  
ولد مادر علی، ماسون طریقت علی، میران علی ولد ریاض علی اور  
ولد مادر علی، ماسون طریقت علی، ماسون ذوالفقار علی

جہاں شاہ عالم گزریا وہ جہاں شاہ عالم گزریا وہ جہاں شاہ عالم گزریا وہ  
جہاں شاہ عالم نے بات شروع کی کہ جہاں شاہ عالم گزریا وہ جہاں شاہ عالم گزریا وہ  
اس سے علاقہ میں ہماری ہوائی سروس سے لہرا رہا تو کری  
کوتھ سے اس کے علاقہ میں ہماری ہوائی سروس سے لہرا رہا تو کری

جہاں شاہ عالم گزریا وہ جہاں شاہ عالم گزریا وہ جہاں شاہ عالم گزریا وہ  
جہاں شاہ عالم گزریا وہ جہاں شاہ عالم گزریا وہ جہاں شاہ عالم گزریا وہ  
جہاں شاہ عالم گزریا وہ جہاں شاہ عالم گزریا وہ جہاں شاہ عالم گزریا وہ  
جہاں شاہ عالم گزریا وہ جہاں شاہ عالم گزریا وہ جہاں شاہ عالم گزریا وہ

10/12/2017  
RAJAH BAHAMANI SHIKHAR P  
C/o: 10/12/2017  
Karnal

سے سٹیم علی اور شہ علی ہی با صلح فرجور ہے۔ - ص ۱۵  
 کو گولیاں مارنے کے بعد ساہ عالم اور معلم علی مرہ سے  
 کمرہ نکال آئے اور جھے منع کیا کہ تم نے دعوے کی رپورٹ  
 پیش کرنا - ہم فوراً نکالے جائیں گے۔ - مسلمان کے گھر سے

فلو ہائے کے لیے میں نے تمہارے کے تیلی فون نمبر 0922-580218  
 پر اس کے تمہارے فون یا از دعوے کا بتایا۔ - کچھ ہر کے لیے  
 لیسے آئی کو یہ سے دربارہ تمہارے فون کیا اور نہ کہا

کہ میرے علاوہ کسی کے لیے ہر رپورٹ درج نہ کریں  
 کیوں کہ جھے اتنے تمہارے مسلمان کا تعلق ہر رپورٹ  
 درج ہوگی۔ - ہر حال ایک گھنٹے کے لیے لو لیں آگے۔

اس دوران مسلمان گھر کے لیے موجود رہے اور جھے گھر سے  
 باہر نکلتے منع کیا۔ - میں ہت نہ کر کے باہر آئی اور لو لیں

کو گھر کے اندر بلا لیا تو SHO ناخوش ہوئے اور لو لیں ایگلڈوں  
 کے ساتھ اندر آیا۔ - لو لیں کو یہ سے سارے دعوے کا بتایا  
 اور دوران میں مسلمان سے ہمارے معلم علی، ساہ عالم کان

فرجور رہے اور جھے بتانے سے کہ تھا کہ نام، لو لیا  
 فرجور رہے اور جھے تمام مسلمان  
 کا خوب عالم کا نام کو۔ - تمام میں سے تمام مسلمان  
 کا SHO کو بتایا۔ - لیڈر ملنے کی رپورٹ سرکارہ

SHO نے جھے سے دستاویز - فوٹو میں مرہ سے  
 نہ مل ہی اور اس میں تاہل ہی کہ اپنا بیان  
 ہر وہ لو لیں کو اس پر ہر کہے بیان ہر دستاویز



پہلے کے تین دن لمبے سمن 29/12/2017 کو SP اسٹیشن ملتان سے  
 مان صابری کے آگے اور واقعہ کی تفصیل جمع کر لی گئی۔ جس سے  
 سارا ماجرا افسانہ بنا لیا۔ SP صاحب نے کہا کہ آپ کی  
 رپورٹ میں کوئی طرف ایک سمن کی موجودگی کا ذکر ہے  
 لیکن ان افسانوں نے مجھے کہا کہ اس بات پر ایمان رکھیں  
 عدالت سمن کرے گی۔ میں سمن داری کی بنا پر گویے  
 میں نکل سکتی تھی دوسرا میرے کان کو خطرات لاحق تھے۔  
 امروزہ پولیس کی حفاظت میں عورت آگے ہوں اور چوٹی

- میرا بیان تمہارے بیان کے مطابق ہے۔
- میں سمن مان محمد علی ولد شاہ عالم
- 2) شاہ عالم کان ولد فریدی 3) منجم علی ولد فریدی
  - 4) سیران ولد ریاض علی 5) نسیم علی ولد ریاض علی
  - 6) ذوالفقار علی ولد نادر علی، 7) ریاض علی ولد نادر علی
  - 8) حار عالم ولد شاہ عالم کان پر ایسے چھترہ حنا دستہ  
 نے معزاز پر قتل کی رو بہ داری کرتے ہوں۔ سمن مان  
 بااثر ہیں لہذا مجھے ان سے خط بھی رہا جائے سارے  
 افسانہ قرار واقعی سزا دی جائے۔

دستخط: - رضی شاہ  
 CNIC: 14301-2342941-0  
 9 deupis - taroan CNIC  
 farheen shah  
 RD 9 AC,  
 Resaved XX

14/12/2017  
 HAJI MUHAMMAD SHAH  
 Civil Judge Juss. Magistrate-VI  
 Faisalabad



# حادثہ انوار کے قتل کے خلاف سول سوسائٹی کا احتجاجی مظاہرہ

## حکومت غیرت کے نام پر قتل روکنے میں ناکام ہوئی ہے

پٹنہ (بھارت) - کولکٹریٹ میں قتل کی جائے والی حادثہ کی خبروں کا کٹا کھٹا خاکہ حکومت غیرت کے نام پر انوار کے قتل کے خلاف سول سوسائٹی میدان میں آئی اور اسے نکل کر مل جل کر طویل پٹنہ کا نام ہو گیا ہے۔ یہ سارا سارا روایت اور سول سوسائٹی کے کھڑے احتجاجی مظاہرہ کرنے کی تحریک انصاف کی حکومت سے مطالبہ کیا گیا ہے۔

پٹنہ کی حکومت نے انصاف کی غیرت میں کام لیا ہے۔ کی تا تو ان سارا سارا کھڑے کی حکومت کے خواہش کے خلاف سول سوسائٹی نے سول سوسائٹی سے سہرا مل سوسائٹی آئیں میں انصاف کے قتل کی خبریں سن کر انوار کے قتل کے خلاف احتجاجی مظاہرہ کرنے کی تحریک انصاف کی حکومت سے مطالبہ کیا گیا ہے۔

ان دنوں پٹنہ کی حکومت نے انصاف کی غیرت میں کام لیا ہے۔ کی تا تو ان سارا سارا کھڑے کی حکومت کے خواہش کے خلاف سول سوسائٹی نے سول سوسائٹی سے سہرا مل سوسائٹی آئیں میں انصاف کے قتل کی خبریں سن کر انوار کے قتل کے خلاف احتجاجی مظاہرہ کرنے کی تحریک انصاف کی حکومت سے مطالبہ کیا گیا ہے۔

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State...Vs....Riaz Ali etc  
690/SC

DW-3: **Statement of Atif Naeem, Madad Muharrir P.S. Ustarzai Kohat on oath:-**

Stated that today I have brought Roznamcha Register dated 23/03/2013, as per Mad report No.10 dated 23/03/2013, at 13:10 hours accused Maisem Ali started Gasht along with ASI Tahir Khan. Similarly, vide Mad No.10 dated 23/03/2013 at 17:00 hours accused Maisem Ali is returned to the P.S. from Gasht, and as per Mad No.12 dated 23/03/2013 at 18:00 hours, police officials who completed their duties were counted and present in police station. Similarly as per Mad No.14 dated 24/03/2013 at 00:50 hours accused Maisem Ali has left the P.S. along with other officials for Gasht. The copy of above mentioned DDs are Ex:DW3/1 consisting of two pages. Original seen and returned. Today I have produced the original register of Daily diary in respect of Ex:DW3/1 consists of 4 sheets, which was inadvertently mentioned as 2 sheets in my examination-in-chief recorded on 07/07/2020. (At this stage at the request of the counsel for complainant / prosecution the original DD was perused, as per the original DD, every second page is missing from the DD.)

XX\_\_\_\_\_ In district Kohat, the DD start at 8:00 AM and also close at 8:00 AM too. It is a fact that on 23/03/2013 at 19:30 hours accused Maisam Ali was not on duty as per the available record. Self stated that as per the DD No.12 he was shown

ATTESTED

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Page 1/1

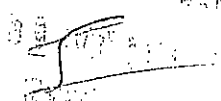
51

DW-03 contd: P-2:

present in between at 18:00 hours. As per the available record the accused Maisam Ali was shown on duty on 24/03/2013 at 00:50 hours, whereas departure from P.S. was shown along with one Tahir Mehmood ASI. It is incorrect to suggest that I being the official colleague of accused, recorded my false statement which is contradicted by the record produced by myself. It is further incorrect to suggest that the record was manipulated, the original paper was torn from the record and later on other paper was prepared, which was pasted in the DD at the instance of accused being police official and tried to save the skin of accused from the case. Self stated that after completion of the DD of the day, we prepared copy for the same for the high ups and send the same to the high ups which is the part of the daily diary and even record the last daily diary that the one copy is sent to the DPO office. It is incorrect to suggest that my volunteer statement is false, afterthought and to fill the lacunas in the record. It is further incorrect to suggest that all the above mention was done at the instance of accused later on.

R.O.&A.C.  
27/05/2023

  
(Ashfaq Taj)  
District & Session Judge,  
Peshawar

ATTESTED  
  
27/05/2023

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POLICE DEPTT:

DISTRICT KOHAT

ORDER

This order is passed on the departmental enquiry against Constable Mehsam Ali No. 1192 of this District Police under the Khyber Pakhtunkhwa, Police Rules, 1975 Amendment 2014.

Brief facts are that while Constable Mehsam Ali No. 1192 posted at Police Lines Kohat who was charged by the complainant in her statement recorded u/s 164 CrPC on 14.02.2017 for the murder of Hina Shanawaz in case FIR No. 37 dated 06.02.2017 u/s 302/311/148/149 PPC PS Usterzal. This act shows inefficiency and gross misconduct on his part.

He was issued Charge Sheet & Statement of Allegations and DSP Legal, Kohat was appointed as Enquiry Officer to proceed against him departmentally. Enquiry officer submitted his finding reported and stated that the defaulter constable is ill-reputed and criminal mind person, report of local police and his involvement in two heinous cases of murder including the case in question rectify his criminal conduct and the allegation leveled against the defaulter are well founded and substantiated.

He was called in OR and heard in person. His reply is perused and found unsatisfactory.

Keeping in view of above facts, finding of Enquiry Officer and available record against the defaulter constable, his further retention in the department may bring bad name to whole Police department, therefore, I Javed Iqbal District Police Officer, Kohat, competent authority under KPK Police Rules 1975 Amendment 2014, hereby award him a major punishment of "dismissal from service" with immediate effect.

OB No. 426  
Date 04-5-2017

DISTRICT POLICE OFFICER,  
KOHAT

OFFICE OF THE DISTRICT POLICE OFFICER, KOHAT

No. 3731-23/PA dated Kohat the 04-5-2017.

1. Reader, Pay Officer, EC and OHC for necessary action.

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017

1  
2017

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OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT

ORDER

This order will dispose of a regular departmental enquiry initiated against Constable Mehsam Ali No. 963, (hereinafter called accused official), under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

2. Short facts of the case are that the accused official was charged in criminal case vide FIR No. 80 dated 24.03.2013 u/ss 302,109, 34 PPC PS Usterzal, Kohat and facing trial in the court of Sessions Judge Peshawar. On conclusion of trial the accused official is convicted u/s 302 (b), 34 PPC and sentenced to the extent of imprisonment for life as tazir and shall pay Rs: 200,000/- as compensation to legal hires of deceased, in default the accused official shall undergo further six months simple imprisonment, vide judgment dated 13.10.2020.

3. The accused official on bail was arrested and confined to Central Prison Peshawar to undergo the sentence. Hence on the above, a charge sheet alongwith statement of allegations was served upon him through Superintendent Central Prison Peshawar, but no reply was received to this office or enquiry officer

4. The enquiry officer (SDPO HQrs) conducted the proceeding accordingly and examined the relevant witnesses. The enquiry officer held the accused official guilty of the charges.

5. In view of above, Final Show Cause Notice alongwith relevant record was served upon the convicted accused official, through Superintendent Central Prison Peshawar, but no reply is received within prescribed period.

6. In view of above and available record, I, came to the conclusion that the charges leveled against the accused official have been established beyond any shadow of doubt. Record further indicates that the accused official is ill reputed. Therefore, I, Javed Iqbal District Police Officer, Kohat, in exercise of powers conferred upon me under the rules ibid, impose a major punishment of dismissal from service upon convicted constable Mehsam Ali No. 963 with immediate effect. (Kit etc allotted to the accused official be collected)

  
DISTRICT POLICE OFFICER,  
KOHAT 24/11

OB No. 830  
Date 24.11.2020  
No 5901-04

IPA dated Kohat the 24-11-2020.

- Copy of above for necessary action to the:-
1. Reader/SRC/OHC/L.O & Pay officer.
  2. Convicted Mehsam Ali through Superintendent Jail concerned for information.

**ORDER**

Constable Masam Ali No.1502 of Elite Force Khyber Pakhtunkhwa is hereby suspended being charged vide case FIR No.80 dated 24.03.2013 U/S 302/34 PPC Police Station Usterzai with immediate effect.

*M. Quraish Khan*  
(MUHAMMAD QURAISH KHAN) P.S.P  
Deputy Commandant  
Elite Force Khyber Pakhtunkhwa Peshawar

No. 4943-48 JEF Date: 03/04/2013

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

1. Superintendent of Police Investigation Wing, Kohat.
2. Superintendent of Police Elite Force, HQrs Khyber Pakhtunkhwa, Peshawar.
3. Deputy Superintendent of Police Elite Force Kohat.
4. Account Elite Force, Khyber Pakhtunkhwa Peshawar.
5. OAS/SRC Elite Force, Khyber Pakhtunkhwa Peshawar.

*in/OC*  
*Pls in the file*  
*30/3*  
*3/4/13*

*Attested*

55



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

**ORDER**

Constable Musam Ali No. 1103 of District Police Kohat on deputation to CTD KPK, Peshawar is hereby repatriated to his parent District Kohat on account of being involved in murder case. His case is under trial. He is hereby suspended, with immediate effect.

He will not be posted at other Units / Districts till the decision of the Court.

(NAJEEB-UR-REHMAN BUGVI) Psp  
AIG/Establishment  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

No. 1950-52 /E-IV dated Peshawar the 16/02/2016

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

1. Deputy Inspector General of Police, Kohat Region, Kohat.
2. Deputy Inspector General of Police, CTD KPK, Peshawar.
3. District Police Officer, Kohat.



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Institution Slip # 38765 - 05 Oct 2023  
For Criminal Appeal against Acquittal - 1398

PESHAWAR HIGH COURT  
Institution Receipt (Original)  
Inst. No. 38765 Date 03-OCT-23  
GA 1398/ Acquitral Appeals  
Abbas Ali Bangash  
via  
Riaz Ali and others  
23/11/2023  
Submitted by:  
Hussain Ali  
Note: Please check status of case on next working day, and if the case is returned due to objection(s) raised by the office, then ensure timely collection of the same by providing this receipt.  
Wasif

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**BEFORE PESHAWAR HIGH COURT, PESHAWAR**

**(Appellate Jurisdiction)**



Criminal Misc Transfer Application /Appeal No: / 2023

In continuity with earlier passed Order (unchallenged/intact till date) of

Chief Justice PHC, Peshawar Order on Cr Misc Transfer Appeal/Application No-53 dated 14 March 2014 (attached)

Col Abbas Ali Bangash s/o Capt Ali Muhammad Bangash (Postal Address: Mangla Cantonment, District Jhelum)

(Applicant/Petitioner)

**VS**

- (1) State ----- Respondent-1
- (2) Accused Mazhar Ali s/o Nadar Ali , Usterzai , Kohat ----- Respondent-2

Petition	Subject/title of Petition
<p>Criminal Misc Transfer Application/Petition</p> <p>In continuity with</p> <p>Chief Justice PHC, Peshawar Order on Cr Misc Transfer Appeal/Application No-53 dated 14 March 2014</p> <p><b>ATTESTED</b> EXAMINER Peshawar High Court Peshawar</p>	<ul style="list-style-type: none"> <li>• For passing <b>Orders/directions</b> to the Court of Session Judge Peshawar to conduct trial of 4<sup>th</sup> Co-Accused namely Mazhar Ali s/o Nadar Ali, who was directly charged in Case FIR-80 dated 24 March 2013 as lodged u/s 302/34/109 PPC in Police Station Usterzai, Kohat, who remained an Absconder for almost 11 x years.</li> <li>• Complete Case Trial in Case FIR-80 had been transferred already from the Court of Session Judge Kohat to Court of Session Judge Peshawar vide Peshawar High Court Order on Cr Misc Transfer Application No-53 of 2013 dated 14 March 2013(attached ); whereof the trial of 3 x Co-Accused has been conducted already by the Court of Session Judge Peshawar.</li> <li>• In line with/continuity of Order of Peshawar High Court, the Supplementary Chállan against Co-Accused Mazhar Ali s/o Nadar Ali was processed by Session Judge Kohat to Session Judge Peshawar for conduct of trial of the accused; however Session Judge Peshawar requires directions from Peshawar High Court to proceed with the trial proceedings of above named accused, despite that Order of Peshawar High Court is unambiguous &amp; remains <b>Not Challenged.</b></li> </ul>

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	<ul style="list-style-type: none"><li>• Furthermore, as per settled law, the trial of 4<sup>th</sup> Co-accused in a same Case/FIR requires to be conducted by the Court of Session Judge Peshawar instead of any other court as it would lead to ambiguities and non-uniformity, which could be objected at the Appeal stage, hence making the process dubious.</li></ul>
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Respectfully Shewethl

1. Brief of the Case. It is respectfully submitted that following 4 x Co-Accused (all close blood relatives- brothers /son/nephew) had been directly charged by the Petitioner in FIR#80 (302/34/109 PPC) dated 24 March 2013, lodged in PS Usterzai Kohat for the brutal murder/assassination/target killing of my deceased father, namely Capt Ali Muhammad Bangash (A veteran of Pakistan Army in the age of 64 years) (Copy of FIR & CrPC-164 statement are attached on Page 20,21,22,23,24).

- a. Riaz Ali s/o Nadar Ali
- b. Meisam Ali s/o Riaz Ali
- c. Zulfiqar Ali Bhutto s/o Nadar Ali
- d. Mazhar Ali s/o Nadar Ali

2. That, 4<sup>th</sup> Accused namely Mazhar Ali remained an Absconder/outlaw for almost 11 x years & his BBA was recalled on 20 November 2023 as Pre-Trial formalities. His trial is now pending before Session Judge Peshawar, however Learned Session Judge Peshawar requires directions from Peshawar High Court Peshawar, in continuity with, earlier passed Order for conduct of trial of above named accused (Copy is attached on Page 17-19 ).

3. Motive of Murder & attached Incriminating Evidences

- a. That, murder was meticulously conspired & planned by the Accused Zulfiqar Ali alias Bhutto, who was charged under 109 of PPC. Page: 56
- b. That, motive of murder was a civil law suit, filed by my deceased father in the Civil Court against illegal occupation of "Qaumi Shamilat" by the Accused Party. Accused Zulifqar Ali Alias Bhutto is the ring leader of Land Mafia and criminal groups in the area, who is being abetted by the most influential people of Kohat District; including religious/sectarian elements, headed by prominent Shia Syed clergy leader namely Syed Ibn e Ali & his family members. Accused Party was in the process of constructing safe sanctuaries / hideouts for the terrorists by illegally occupying "Qaumi Shamilat", but their efforts were effectively thwarted/resisted / frustrated by my deceased father, through filing of a civil law suit in Kohat Courts. Page: 56

ATTESTED  
EXAMINER  
Peshawar High Court  
Peshawar

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- c. That, sequel to continuous life threats having been extended to my deceased father by the Accused Party; my father<sup>had</sup> complained to Kohat Police & Magistrate vide his letters. A Surety Bond under Section Cr PC 107/51 was also obtained from the Accused Zulifqar Ali alias Bhutto. Accused party carries no regard for judicial procedures and sureties even. (Copies are attached on Page No 53-58)
- d. That, On 30 March 2013, two Female Eye Witnesses namely PW Alia Perveen and PW Maria Perveen (daughters of deceased), had recorded their CrPC-164 Statements & stated that they would be able to identify the firers/accused, if brought/paraded before them. (Copies are attached on Page 23-24).
- e. That, on 03 April 2013, accordingly Identification Parade of Accused Riaz Ali & Meisam Ali was conducted in Kohat Prison, wherein they were correctly identified by the 2 x Female Eye Witnesses (daughters of deceased). (Copy is attached on Page 25-28)
- f. That, a Female Eye Witness also testified before the Learned Session Courts Peshawar as PW during 1<sup>st</sup> stage of the Trial of case FIR-80. (Record)
- g. That, following Incriminating Evidences had been attached with Main Challan by the Police (Record) :-

(1) Parcels

- (a) Parcel-1 : Blood Stained Pebbles
- (b) Parcel-2 : 16 x empties 7.62 MM
- (c) Parcel-3: Garments (Shalwar Qameez + Waistcoat + White Banyan)
- (d) Parcel-4 : Torch & Search Light
- (e) Parcel-5 : Official Rifle AK-47 - 7.62 mm

(2) FSL Reports

- (a) FSL-1 : Pebbles + Clothes for matching Blood (Parcel No-1 & 3) + Human Blood + A+ Gp
- (b) FSL-2 (Fire Arm): 16 x empties / opinion of arms
- (c) FSL-3 : AK-47 / Rfl No-313-56-14611810 - Parcel-5 (Empties did not match with the official rifle of accused)

- (3) Site Plan of Occurrence
- (4) Post Mortem Report
- (5) Call Dialing Record showing locations of accused party
- (6) 10 x Pictures of the deceased
- (7) Legal documents proving motive of the murder

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h. Identification Parade of Co-Accused Mazhar Ali s/o Nadar Ali dated 02 December 2023

(1) That, on 28 November 2023, Identification Parade of Accused Mazhar Ali was affixed at Kohat Prison, 2 x Female Eye Witnesses travelled from Muzaffarabad, AJ&K ; but due to life threats from accused party, they had to be sent back for their security/safety. Accordingly, this fact was mentioned by the Magistrate Kohat in his Order Sheet dated 28 November 2023 ; which sufficiently establishes the fact that Female Eye Witnesses are receiving life threats<sup>even now</sup> from accused party till date. This also reflects that there is no change in circumstances on the ground even today (Copy is attached on Page No 76, 843-48).

(2) That, on 02 December 2023, Identification Parade of Co-Accused Mazhar Ali was conducted under supervision of Magistrate-1 Kohat, whereof the Female Eye Witness has correctly identified the Co-Accused Mazhar Ali for having fired at the deceased, even after 11 x years of his absconding. Hence, life threats are posed to the life of above named Eye Witness, who would be required to testify against the accused & under the circumstances, she cannot travel to Kohat and this would favor the accused unduly. Page : 43-48

4. Cogent & Irrefutable Evidences with regards to Serious Life Threats posed to myself and Female Eye Witnesses, which remains valid even in trial of 4<sup>th</sup> Co-accused Mazhar Ali s/o Nadar Ali

a. That, given my military background & having participated in various military operations as an Army Officer against Terrorist groups in erstwhile Orakzai & Kurram Agencies (both located on the fringes of District <sup>Kohat</sup>, sharing a common border and passage routes), these terrorist groups are closely associated with Accused party, who all are established criminals in Kohat/adjacent areas. I & my family members including 2 x Female Eye Witnesses (daughters of deceased) are receiving life threats from Accused Party, meant to force us to step back from pursuance of the trial. I have also mentioned about nexus of accused party with terrorists of Kurram and Orakzai Agencies in FIR, which further reinforce my pledge before this Honorable Court (Copy is attached on Page No 20-21).

b. That, given the criminal Background of Accused party as evident from various past FIRs including one, whereof a young lady named Hina Shah Nawaz had been brutally murdered in Kohat in 2017 by the same Accused party ; threats to female Eye Witness stands enormous. Accused

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party has also been involved in firing/killing against Police officials in Usterzai Kohat ; which reflect their mercilessness and hard core militant wherewithal and manpower, which pose serious threat to our lives at Kohat. Accused party maintains linkages with the most dangerous Target Killers of Kohat Districts. Earlier, Accused Meisam Ali had brought a Target Killer against me in the premises of Session Courts Kohat. (Copies of FIRs are attached on Page 77-95 , 886-90)

- c. That, Accused party continue to serve as facilitators for the terror groups operating in Kohat & adjacent tribal districts of Orakzai and Kurram ; where law and order situation has deteriorated significantly over the past One year & getting precarious continuously. Given the dilapidated state of training, resources manpower & intelligence capabilities; Kohat Police do not have requisite resolve & capability to mount an effective action / operation against this menace in the area, which has further emboldened Accused Party (an organized criminal group). Page : 79-81 (FIR)
- d. That, Accused Party also wields profound negative influence / ingress in the lower cadre of local Police , being very influential / well-linked in the area in terms of manpower, weapons and through exploitation of Sectarian / religious sensitivities/pooling in the area. Accused Meisam Ali, an ELITE Police Force Personnel wields profound influence in Kohat Police; hence Kohat Police cannot be trusted for security of myself & 2 x Female Eye Witnesses. Village Usterzai is located hardly at a distance of 17 km from Court of Session Courts Kohat; hence it provides immense criminal leverage to the accused party, in terms of amassing manpower, weapons & ammunition. Therefore, Trial at Kohat provides accused party with an easy access, reach and abundance of opportunities of our target killing in Kohat & on all routes leading to Kohat. Accused Meisam Ali retains access onto Call tapping and location tracing technology of cellular phones/SIMs of CTD Police; which also pose tremendous life threats to us, during our travel to Kohat.
- e. That, my deceased father was a Secular Person in nature, who was an excellent Poet of Urdu, Pashto and English. Being a literate /knowledgeable person he had always forged unity & cohesion amongst the locals in the area for their collective well-being & prosperity against violent and exploitation forces. My deceased father has always denounced the sectarian violence/exploitation of the situation by the influential "Syeds" of the area (Shia clerics who remain in control of religious seminaries). Accused party has been closely supported by this

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**Influential religious group known as "Syeds".** I would like to discuss this sensitive aspect in the court in greater detail during my arguments, by drawing its particular relevance to the threats <sup>posed</sup> to my life and lives of 2 x Eye Witnesses. It is also important to highlight that **Advocate Syed Muzahir Hussain**, who is the Defense Council of Accused Party in this murder case also belong to the same religious/sectarian cleric group, who protects these hardened criminals in the courts. This sectarian group has been one of the causes of sectarian clashes/violence in the area as this group effectively controls the religious seminaries for the sole purpose of personal growth/prosperity of their families and occupation of Qaumi Shamilat/lands of suppressed people. The above named advocate had been the Defense Council of Accused Zulfiqar Ali alias Bhutto in the civil law suit filed by my father, which unfortunately became the motive of murder of my father. The efforts of my father in terms of educating poor and deprived people of the area were not welcomed as it would have created the awareness against Shia clergy Syeds headed by Syed Ibn-e -Ali. Furthermore, Ex Chief Justice Peshawar High Court Peshawar & Ex Governor KPK namely Syed Ibn e Ali & his son Additional Session Judge Syed Ihtisham also hails from our village Usterzai Payan , who both have an established nexus with Accused party & history of animosity with my deceased father due to his noble ideas for Muslims of all faith. They continue to protect all <sup>the</sup> criminal acts of Accused party in the area for furtherance of their sectarian (Iranian based Shia ideology/conglomerate), political objectives & suppression of common people for occupation of their lands in the area. A nephew of Syed Ibn e Ali namely Syed Abid Jawad had been nominated in FIR-48 for firing on Police officials in Kohat alongwith co-accused Zulfiqar Ali alias Bhutto & Izhar Ali. In FIR-48's incident dated 11 April 1997; Syed Abid Jawad had been charged for firing onto police officials near Usterzai Kohat, as result of which, several police officials had lost their lives & several got injured. The sectarian volatility & sensitivity attached to murder of my father also makes my request genuine. Syed Ibn-e -Ali, being settled at Kohat may negatively influence any proceedings at Kohat to my disadvantage (Copy is attached on Page

79-81 & 57-58

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That, I had been timely reporting to Police authorities at Kohat and Peshawar regarding these serious life threats through my personal interaction with Police officials, telephonic conversations and formal correspondence. But, unfortunately no worthwhile / concrete actions have

been taken / instituted by the Police Officials; which compelled me to knock the door of Peshawar High Court. To an extent, that I have provided them all the precise details of these threatening mobile calls to Police Officials and Government through my letter, but nothing was done in this regard (Copies are attached on Page 59-72 )

g. That, to attend trial hearings / proceedings in the Session Court Kohat, I will be compelled to travel via Road Mangla - Rawalpindi - Fateh Jang - Jhand & Fateh Jhang , which passes, through desolate terrain and offers ideal ambush sites for our target killing. Travel via Road Rawalpindi - Peshawar - Mattani - Darra Adam Khel - Kohat also pose tremendous life threats. Above routes are insecure particularly for the travel of Female Eye Witnesses. Furthermore, our road move to Kohat can be effectively monitored by the Accused Police Constable Meisam Ali through his peers/ links in the Police (posted on check posts on the road) on both routes.

h. That, trial at Session Courts Peshawar, would afford us to travel on a safer route of Road Mangla - Rawalpindi - Peshawar in the shape of Motorway. Even on above route, we will be travelling more distance as compared to accused, who would require to travel a turnaround distance of only 140 km, whereas we would <sup>still</sup> be travelling a turnaround distance of almost 700 km.

i. That, suitable location of trial of this case stands out to be Peshawar, being a major city having better security arrangements in place. *We dont reside in Kohat.*

5. In the past , Accused party has tampered with the evidences of the Case FIR, hence they would repeat the same with the case file of Accused Mazhar Ali at Kohat (Copy is attached on Page 96-102 ).

6. Crux of Orders of Chief Justice Peshawar High Court dated 14 March 2014 on Transfer of Complete Trial in Case FIR-80 *Page : 17-19*

a. Para-1 of Order. Chief Justice Peshawar High Court Peshawar has clearly mentioned *that petitioner seeks the transfer of trial in case FIR-80 dated 24 March 2013 from the Court of Session Judge Kohat to Court of Session Courts of Peshawar*, hence this clearly establishes the fact that I had requested for transfer of Complete Trial/ in totality in case FIR-80, which was also acknowledged as such by the High Court, without any ambiguity. Common sense also suggests that my request was aimed at conduct of trial of all 4 x accused nominated in the FIR-80: No petitioner would desire for conduct of trial in piece meal in separate trial courts. At the time of Order, only 2 x accused had appeared before the Court, whereas 3<sup>rd</sup>

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one joined later and for him no separate request for trial was processed to High Court for directions. **Page-17**

b. Para-2 of the Order. Chief Justice Peshawar High Court Peshawar has mentioned names of all Accused namely Riaz Ali, Mazhar Ali, Meisam Ali and Zulfiqar Ali alias Bhutto. Name of 4<sup>th</sup> Accused namely Mazhar Ali has also been mentioned by the Chief Justice Peshawar High Court, Peshawar. Hence, this establishes the fact that Chief Justice Peshawar High Court Peshawar was crystal clear in his mind with regards to conduct of trial of all 4 x Accused by the Session Judge Peshawar & therefore he has transferred the trial of all 4 x accused. **Page-17**

c. Last Para-7 of Order : In concluding para, the Honorable Chief Justice Peshawar High Court has unambiguously stated that *"For the aforesaid reasons, this application is accepted and trial of the case is transferred from the court of Session Judge Kohat to the Court of Session Judge Peshawar. The DPO Kohat is directed to ensure the safe travel of females Eye Witnesses as and when required by the Court. The Learned Session Judge Peshawar is directed to conduct trial in the case on urgent basis"* **Page: 19**

d. That State also supported the transfer of trial of Case FIR-80 from Court of Session Judge Kohat to Court of Session Judge Peshawar, which remains valid to the extent of Accused Mazhar Ali as well. **Page: 18**

e. That, in view of above facts, which are prevalent & relevant even today, Chief Justice Peshawar High Court transferred the Trial in Case FIR-80 ( Complete trial) from Court of Session Judge Kohat to Session Judge Peshawar vide Order dated 14 March 2014. Trial of 3 x Co-Accused had been conducted already by the Session Judge Peshawar (Copy is attached on Page **31-32 & 41**

f. That, Order of Chief Justice Peshawar High Court had not been challenged before the Supreme Court of Pak neither by the state nor by the accused party; hence it remains valid even for the conduct of trial of 4<sup>th</sup> Accused, who remained an absconder for almost 11 x years. **Page: 17-19**

7. Detail of various various stages of trials so far conducted in Case FIR-80 by the Session Judge Peshawar

a. Transfer of Trial of Case FIR-80 on 14 March 2014 by Chief Justice Peshawar High Court Peshawar to Court of Session Judge Peshawar. **P-17-1'**

1<sup>st</sup> Trial : On the day of transfer of Trial in case FIR-80, 2 x accused namely Riaz Ali & Meisam Ali had surrendered before the court and facing trial.

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Charge Sheet was framed by Session Judge Peshawar (Copy is attached on Page 29).

- c. Re-commencement of Trial with amended Charge Sheet : Subsequently in September 2014, Accused Zulfiqar Ali Bhutto also surrendered himself and joined trial in the Court of Session Judge Peshawar. His Supplementary Challan was also submitted before Session Judge Peshawar by the DPP Kohat. No separate Transfer petition was filed before Peshawar High Courts Peshawar (Copy is attached on Page 30).
- d. 1<sup>st</sup> Order by Session Judge Peshawar : On 13 October 2020, 2 x accused namely Riaz Ali and Meisam Ali were convicted by the Session Judge Peshawar (Copy of the Order is att on Page 31-32).
- e. Trial on Remand. On Appeal, the trial on Remand (On orders of Peshawar High Court) was also conducted by Session Judge Peshawar (Copy is attached on Page 33-40).
- f. 2<sup>nd</sup> Order on Trial on Remand by Session Judge Peshawar : Session Judge Peshawar passed his Order on 16 September 2023 (Copy is attached on Page 41).

8. Legal Grounds for passing Directions /elaboration to Learned Session Judge Peshawar for entertaining the conduct of trial of 4<sup>th</sup> Co-accused namely Mazhar Ali s/o Nadar Ali

- a. That, on 12 December 2023, Ses sion Judge Kohat has processed the Supplementary Challan of Co-accused Mazhar Ali to Session Judge Peshawar for conduct of his trial on the basis of transfer of Trial of the Case to Session Judge Peshawar & also on the basis that earlier trial of 3 x Co-Accused had been conducted by the Session Judge Peshawar (Copy of Order Sheet is attached on Page 51).
- b. That, it is a settled law /principle that a trial court, which has conducted the trial of Co-accused (3 x Co-accused) already, inherently becomes the trial court for remaining accused/co-accused. Hence, the trial of Accused Mazhar Ali is also to be conducted by Court of Session Judge Peshawar. P-49-51
- c. That, digital and file Record of the previous trials is also held with Session Courts Peshawar. Same record will be required for conduct of trial of Mazhar Ali, as all previous recorded PWs will have to testify against him in the court. Hence, the convenience of trial also lies in favor of conduct of trial at Session Courts Peshawar

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That, most of the PWs of 1<sup>st</sup> trial are located away from Kohat and Court of Session Courts Peshawar remains to be the convenient location for majority of PWs; therefore convenience of summoning PWs to the court also lies in

favor of conduct of trial in the Court of Session Judge Peshawar instead of Session Courts Kohat.

- e. That , law and Order situation has erupted between Petitioner and Accused party after lodging of FIR-80 (24 March 2013) and its proofs exists in the shape of FIR-539 (u/s 506/352 PPC) dated 27 November 2014. Hence , situation is grim between the parties and it warrants trial of accused at the Court of Session Judge Peshawar. *Copy on Page 84-85 (FIR)*
- f. That, Session Judge Peshawar requires directions from Chief Justice Peshawar High Court for conduct of trial of 4<sup>th</sup> Accused namely , Mazhar Ali. *P-5a*
- g. That, at no point I had ever objected on any Judge in person. I trust judiciary & accept their verdicts with open heart. However, I do retain the right of Appeal in a respectful & dignified manner for removal of anomalies in an earlier verdict. I trust every Honorable Judge in Peshawar and cannot have any preferences. *h. Other facts will be agitated during hearing*

9. Prayers. For the aforesaid reasons and grounds, following is respectively prayed before Honorable Chief Justice Peshawar High Court Peshawar :-

- a. That, in continuity with earlier passed Order of Chief Justice Peshawar High Court Peshawar dated 14 March 2013 on transfer of trial in Case FIR-80 (u/s 302/34/109 PPC) dated 24 March 2013 at PS Usterzai Kohat; the Learned Session Judge Peshawar may be directed to conduct trial of 4<sup>th</sup> Co-accused namely Mazhar Ali s/o Nadar Ali (who remained an absconder for almost 11 x years). The conduct of trial of above named accused by the Court of Session Judge Peshawar lies in continuity/tandem with already conducted trial of 3 x Co-accused, as one and the same trial court is required to conduct trial of all Co-accused nominated in a single FIR case for uniformity of standards/procedures & also to ward off doubts/legal lacuna appearing at Appeal Stage at High Court & Supreme Court.
- b. That, till final Order by the Peshawar High Court, the Learned Court of Session Judge Kohat may be directed to halt judicial proceedings with regards to 4<sup>th</sup> Co-accused namely Mazhar Ali s/o Nadar Ali; as until clarity, any such proceedings would lie in contradiction to the earlier passed Order of Chief Justice Peshawar High Court, Peshawar & would also be tangent to the settled principles of law/procedures, whereby one and the same trial court is required to conduct the trial of all Co-accused nominated in single Case FIR, in order to ward off the chances of varying/contradicting standards, legal issues & doubts arising at Appeal stage at the High Court & Supreme Court.

*Intention Relief* →

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c. That, till final Orders, Judicial file /Supplementary challan of Accused Mazhar Ali s/o Nadar Ali may be consigned to the Record Room of Court of Session Judge Peshawar for its safety, so as to ward off any malicious attempts of Accused party in terms of tampering with the incriminating evidences, as they have done in the past.

d. Previous & Challan/Judicial file of Accused Mazhar Ali may be requisitioned for hearing, please. record



Petitioner - In- Person

(Colonel Abbas Ali Bangash)

Date: 20 December 2023

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EXAMINER  
Peshawar High Court, Peshawar  
Authorized Under Article 8, 7 of  
the Qanun-e-Shahadat Act 1984

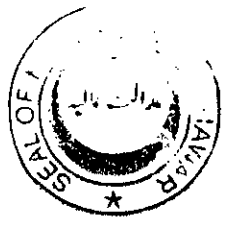
13 JAN 2024

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**PESHAWAR HIGH COURT, PESHAWAR**

**FORM OF ORDER SHEET**

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge.
1	2
12.01.2024	<p><b><u>Cr.M (Transfer Application) No. 84-P/2023</u></b></p> <p>Present: Petitioner in person.</p> <p>***</p> <p><b><u>MOHAMMAD IBRAHIM KHAN, CJ:</u></b></p> <p>The applicant Abbas Ali Bangash son of Ali Muhammad Bangash has filed this application under section 526 CrPC for transfer of the trial in case FIR No. 80 dated 24.03.2013 under sections 302-34-109 PPC of Police Station Usterzai, District Kohat from District Kohat to District Peshawar on the ground that trial of co-accused has been conducted by the learned Sessions Judge, Peshawar in light of the order of this court passed in C.M No. 53 of 2013 decided on 14.03.2014.</p> <p>2. Arguments heard and available record gone through.</p>



*Handwritten signature/initials*

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Peshawar

3. Since, the trial of co-accused has been conducted by the learned Sessions Judge, Peshawar on the strength of order of this court passed in CM TA No. 53 of 2013 decided on 14.03.2014 hence, this petition is allowed whereby, the trial of accused Mazhar Ali is transferred from District Kohat to the Court of learned Sessions Judge, Peshawar for deciding the same on merits in accordance with law.

Announced  
12.01.2024

*Chief Justice*  
Chief Justice

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EXAMINER  
Peshawar High Court, Peshawar  
Authorized Under Article 8, 7 of  
the Qanun-e-Shahadat Act 1984

13 JAN 2024

28664 D-1-24

Date of Presentation of Application  
No of Pages 14  
Copying fee 56  
Total  
Date of Preparation of Copy 13-1-24  
Date of Delivery of Copy 13-1-24

*Muhammad Fiaz*



\*Muhammad Fiaz\* \*S.B\* Hon'ble Mr. Justice Mohammad Ibrahim Khan, CJ

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# PESHAWAR HIGH COURT, PESHAWAR

## FORM OF ORDER SHEET



Date of Order or Proceedings	Order of other Proceedings with Signature of Judge.
1	2
15.02.2024	<p><u>Cr.A No.1398-P/2023.</u></p> <p><b>Present:</b></p> <p style="text-align: center;"><b>Mr. Hussain Ali, Advocate, for the appellant.</b></p> <p style="text-align: center;">*****</p> <p><i>Inter-alia</i> contends that in earlier round of litigation, the accused-respondents were convicted and sentenced, however, on remand of the case to the learned trial court, the accused were acquitted of the charges on the same set of evidence. After hearing the learned counsel for the appellant, we are of the view that the case requires re-appraisal of evidence. Admit. Notice.</p> <p>Bailable warrant of arrest in the sum of Rs.50,000/- (fifty thousand rupees) with two sureties each in the like amount be issued against the accused-respondent to the satisfaction of Additional Registrar Judicial of this Court.</p> <p style="text-align: right;">   <b>JUDGE</b> </p> <p style="text-align: right;">   <b>JUDGE</b> </p> <p style="text-align: center;">           33153            15-02-2024            S-P            20-W            20-02-2024            20-02-2024            (Hudud Shah, 555) "DB" 114-116 Mr. Justice Shahid Ahmad and Mr. Justice Wajid Ahmad         </p>

**CERTIFIED TO BE TRUE COPY**  
 EXAMINER  
 Peshawar High Court, Peshawar  
 Authorized Under Article 8, 7 of  
 the Qanun-e-Shahadat Act 1984  
 20 FEB 2024

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A

IN THE PESHAWAR HIGH COURT PESHAWAR  
OPENING SHEET FOR CRIMINAL BRANCH

Case Type

Case NO

Date of Filing 2/10/2023

District: Peshawar

Cri.Appeal	Cri. Revision	Cri.Misc	T.A (Cri)	I.C.A
1. Category Code				Review In
(Categories & sub-Categories are given at back of the opening Sheet)				



Case lies against	FIR#/ Police Station (in state case)	Decided by Court / Forum	Date of Decision	Result/ sentence	Whether decision are concurrent or at variance
Original Order/ proceedings	FIR NO 80 P.S Ustarzal Kohat	Session Judge Peshawar	16/9/202 3	Respondents were acquitted	
Review	Revision	Appeal			

Particulars of Petitioner/ Appellant & Respondent.

Appellant(s)/ Petitioner(s) \* (Accused/ complainant/  
**Abbas Ali Bangash s/o Ali Muhammad Bangash**  
**R/o ustarzal payan Tehsil & Distt: Kohat**  
 \Mobile No \_\_\_\_\_  
 Name of Jail in which appellant/ pet/ Respondent confined/ custody : NIL

2. Appellant (s) Petitioner(s) Counsel \*(Accused/ Complainant)\_\_\_\_  
 Mobile No 0333-9105258 E-mail hussalnawchamber15a@yahoo.com  
 Address 16-B Rehman Plaza Peshawar  
 Name of Jail in which appellant/ pet/ Respondent confined, if in custody:\_\_\_\_  
 Respondents (s) (Accused/ Complainant) :  
 1) **Riaz Ali s/o Nadar Khan**  
 2) **melsam Ali s/o Riaz Ali**  
 3) **Zulfiqar Ali alias Bhutto s/o Nadar Ali**  
**All R/o Ustarzal Payan Tehsil & Distt: Kohat**

Name of Jail in which Respondent confined, if in custody \_\_\_\_\_

Relevant Law (s) (nee of the law (s))	Relevant section (s)/ clause (s) Sub-Section (s)/ sub-clause(s)
PPC	302/34/109-ppc
ATA	
Special Law (give name of enactment)	

**Prayer :** It is therefore, humbly prayed that on acceptance of this appeal ,  
judgment and order impugned herein; be set aside and Respondents -#1 to 3  
may please be convicted and sentenced U/S 302/34/109-PPC by awarding them  
punishment in the interest of justice.

Signature of Appellant/ Petitioner or Counsel: *[Signature]* Dated 2/10/2023

\*use extra sheet if required. (No of extra sheets used \_\_\_\_\_)  
\*\* Copy to be attached Note: Any suggestion to improve the proforma will be appreciated

**ATTESTED**  
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BEFORE THE PESHAWAR HIGH COURT PESHAWAR.

Cr.Appeal # \_\_\_\_\_ /2023

Abbas Ali Bangash s/o All Muhammad Bangash  
R/o Ustarzal payan, Tehsil & Distt: Kohat ..... Appellant

VERSUS

- 1) Riaz Ali
  - 2) Zulfiqar All alaias Bhutto sons of Nadar Khan
  - 3) Meisam All s/o Riaz All  
All R/o Ustarzal Payan ,Tehsil & Distt: Kohat
  - 4) The State
- .....Respondents

FIR # 80 Dated 24/3/20213  
U/S 302/34/109-PPC  
P.S Ustarzal (Kohat)  
=====

Criminal appeal u/s 417(2-A) CrPC , against  
the Judgment and order dated 16/9/2023 passed by  
Session Judge Peshawar vide which respondents  
# 1 to 3, (Accused in case FIR as mentioned  
above) have been acquitted of the charges u/s  
302/34/ 109- PPC  
=====

Prayer in Appeal:

On acceptance of this appeal , the judgment and order  
Dated 16/9/2023 impugned here in, be set aside to  
the ends of justice and the Respondents # 1 to 3 ,  
may please be convicted and sentence  
u/s 302/ 34/109 PPC by awarding them punishment in  
according to Law.  
=====

GRONDS OF APPEAL.

- 1) That the impugned Judgment and order of acquittal of respondents  
# 1 to 3 , dated 16/9/2023 passed by Session Judge Peshawar  
manifestly against law and facts , hence untenable.
- 2) That the impugned order passed by the trial court is wholly un-  
reasonable and untenable . That the evidence produced by the  
prosecution has not been considered in the proper perspective.
- 3) That the ocular testimony had a ring of truth around it, inspired  
confidence and from evidence produced and material brought

CRA1398-2023 ABBAS ALI VS RIAZ ALI CF PG89

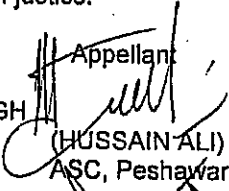
**ATTESTED**  
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Peshawar High Court  
Peshawar

on record, overwhelming proof of committing, the offence by the Respondents #1 to 3, were apparent on the face of the record but still the order of acquittal has been passed entailing the judgment /order on complete misreading of evidence indicating great miscarriage of justice in reasons and conclusion arrived at beside artificial are erroneous.

- 4) That the learned trial court did not appreciate the evidence as per principle laid down by the superior courts from time to time and has gravely erred to discard the direct evidence and as such, acquittal order passed by the lower court.
- 5) That the ground which prevails with the trial court qua acquittal of the Respondents # 1 to 3, are whimsical and unwarranted under the law.
- 6) That the prosecution has established its case beyond the reasonable doubt particularly to extent of involvement of Respondents # 1 to 3, in the case rather prosecution case is in proper sequence least to say about direct statement of PWs before the trial court which could not be rebutted in any manner whatsoever but even then the learned trial court while acquitting the Accused /Respondents -#1 to 3, have committed grave miscarriage.
- 7) That the accused / respondents were earlier convicted by the trial court on 13/10/2020 and against the said order appeal was filed before this Hon:ble Court, the case of the accused were remanded to the trial court for examination of the defense witness already examined during the previous trial or to place on file triplicate copies of the statement of the defense witness only.
- 8) That as per the law the domain of the trial court after the remand was only to the extent that the direction of this Hon:ble Court be complied with to the extent of rectifying and identified the plea of the accused to the extent of their defense evidence only.

It is therefore, humbly prayed that on acceptance of this appeal, judgment and order impugned herein be set aside and Respondents -#1 to 3, may please be convicted and sentenced U/S 302/34/109-PPC by awarding them punishment in the interest of justice.

THROUGH

Appellant  
  
 (HUSSAIN ALI)  
 ASC, Peshawar.

(Rehmat Ullah)

&

(Abdul wahab)

**ATTESTED**  
 EXAMINER  
 Peshawar High Court  
 Peshawar

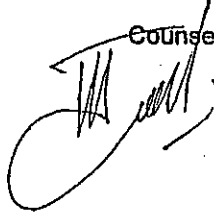
74

B

**CERTIFICATE.**

Certified that the appellant has not filed an appeal in this August Court earlier to this one

Counsel



~~CERTIFIED TO BE TRUE COPY  
EXAMINER  
Peshawar High Court, Peshawar  
Authorized Under Article 67 of  
the Qanun-e-Shahadat Act 1984  
20 FEB 2024~~

انسپیکٹور جنرل پولیس حیدرآباد خیر پور

نام خیر پور - ۲۰۰۵

# ابتدائی اطلاع رپورٹ

فائل نمبر ابتدائی اطلاع نمبر جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ ۱۵۴ مجموعہ ضابطہ وجہ جاری

خانہ مستردگی

ضلع آگٹ

نمبر 30 48

تاریخ و وقت وقوع ۱۱/۴/۹۷ وقت 3.00

1	تاریخ و وقت رپورٹ	۱۱/۴/۹۷ وقت ۳.۰۰ بجے
2	نام و کونست، اطلاع دہندہ و مستفید	اسرار علی (A.S.I) مستفید
3	مختصر کیفیت جرم (محدود رقم) حال اگر کچھ لیا گیا ہو	۱۱/۴/۹۷ / ۳۵۳ / ۱۱۲۶ / ۱۱۲۶
4	جائے وقوعہ کا مسطحہ خانہ سے اور سمت	۱۵۹
5	نام و کونست ملزم	
6	کارروائی جو کیفیت کے متعلق ناگوار اگر اطلاع درج کرنے میں تاخیر ہو تو وجہ بیان کرو۔	سرکار کے حکم پر
7	مخاندان سے درانتی کی تاریخ و وقت	سرکار کے حکم پر

ابتدائی اطلاع نیچے درج کرو ایک فیوری میں اسرار علی (A.S.I) نے رپورٹ کیا کہ اس کے پاس ایک گاڑی ہے جس کا نمبر ۱۱۲۶ ہے۔ اس گاڑی میں ایک شخص بیٹھتا ہے جس کا نام اسرار علی ہے۔ اس شخص کو اسرار علی نے اس گاڑی سے نکلنے پر روک دیا ہے۔ اس شخص کو اسرار علی نے اس گاڑی سے نکلنے پر روک دیا ہے۔ اس شخص کو اسرار علی نے اس گاڑی سے نکلنے پر روک دیا ہے۔

تفصیل درج کریں  
 سہ ماہی کے پختے پر فوراً خانہ پوری کی جائے گی  
 حوزہ زہر بھینس سوڑا 6/97 14 اگر بزرگ رسید  
 138/11/25 6/97 11/11/25  
 سہ ماہی کے پختے پر فوراً خانہ پوری کی جائے گی

تاریخ پورٹ ضمنی	نام فریقین کنندہ	نمبر	تاریخ رپورٹ ضمنی	نام فریقین کنندہ	نمبر	تاریخ پورٹ ضمنی	نام فریقین کنندہ
11.4.97	فردوس خان	7	8.5.97	فردوس خان	7	3.6.97	سید عیسیٰ خان
11.4.97	سید عیسیٰ خان	8	28.5.97	سید عیسیٰ خان	8	4.6.97	سید عیسیٰ خان
12.4.97	فردوس خان	9	29.5.97	سید عیسیٰ خان	9	5.6.97	سید عیسیٰ خان
13.4.97	سید عیسیٰ خان	10	30.5.97	سید عیسیٰ خان	10	6.6.97	سید عیسیٰ خان
20.4.97	سید عیسیٰ خان	11	31.5.97	سید عیسیٰ خان	11	11.6.97	سید عیسیٰ خان
30.4.97	سید عیسیٰ خان	12	01.6.97	سید عیسیٰ خان	12	16.6.97	سید عیسیٰ خان
5.5.97	سید عیسیٰ خان	13	2.6.97	سید عیسیٰ خان	13	23.6.97	سید عیسیٰ خان

اطلاع جو حالان بار پورٹ افسانہ کے بھیجے ہو وہ سہ ماہی کے پختے پر فوراً خانہ پوری کی جائے گی  
 24.6.97  
 18.7.97

لاچالان کیا گیا ہو	نمبر	(دب) ضمانت یا پیکر پر (ج) جو برائے تجویز بھیجا گیا ہو
1	1318	اقبال رضی ولد کور علی سہ ماہی
2	216	بار علی ولد شہید علی سہ ماہی
3	733	درد افکار علی ولد کور علی سہ ماہی
4	175	عابد قوراد ولد عیسیٰ خان سہ ماہی
5	193	سید عیسیٰ خان سہ ماہی
6	216	سید عیسیٰ خان سہ ماہی
7	216	سید عیسیٰ خان سہ ماہی
8	216	سید عیسیٰ خان سہ ماہی
9	216	سید عیسیٰ خان سہ ماہی
10	216	سید عیسیٰ خان سہ ماہی
11	216	سید عیسیٰ خان سہ ماہی
12	216	سید عیسیٰ خان سہ ماہی
13	216	سید عیسیٰ خان سہ ماہی
14	216	سید عیسیٰ خان سہ ماہی
15	216	سید عیسیٰ خان سہ ماہی
16	216	سید عیسیٰ خان سہ ماہی

Handwritten notes and signatures on the right side of the table, including dates like 11/11/25 and 6/97.

پولیس نمبر ۱۰۲

# ایڈیشنل اطلاع رپورٹ

کونٹر

(فائیل) ایڈیشنل اطلاع نسبت مجرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ ۱۰۲ مجموعہ منابطہ نوپوری

منسلح کورٹ

مختارہ اسٹریٹی

تاریخ و وقت وقوع 23/3 وقت 19:30 بجے

نمبر 80

تاریخ و وقت رپورٹ 24/3 وقت	09:00 بجے جاگیدگی پر 24/3 وقت 09:25 بجے
ام و سکونت اطلاع دہندہ و مستفید	میر عیاس علی بٹنٹ لوہڑی محلہ 36 سالہ علی محمد بٹنٹ سکے اسٹریٹی بابا
شکر کیفیت مجرم (معدوم) حال اگر کچھ لیا گیا ہو	109   34   302   12
پاٹے وقوع نامہ مختارہ سے اہمیت	مرد خانہ مشمول علی محمد بٹنٹ واقع اسٹریٹی بابا
نام و سکونت ملزمان ذوالفقار علی عرفان	دندہ فطہ علی (3) زباق علی لیران نادری سکستان اسٹریٹی بابا
نادرانی موقع پیش کے متعلق کوئی اگر اطلاع درج کرنے میں توقف ہو تو درجہ بیان کرو۔	رپورٹ وارڈ نمبر دیا جائے
مختارہ سے روایت کی تاریخ و وقت	بطور منسل رپورٹ

ایڈیشنل اطلاع نیچے درج کو و مستفید مختارہ جانہ نمبر 2 باہری  
 بھائی اکبر بٹنٹ ولد مشمول کٹین رسا رپورٹ علی محمد بٹنٹ لوہڑی محلہ 36 سالہ سکے اسٹریٹی  
 بابا بابا پولیس رپورٹ کرنا چاہتا تھا کہ میں پاکستان آری نمبر PA37644 میر عیاس علی بٹنٹ  
 محلہ 36 سالہ لکھن رسا رپورٹ علی محمد بٹنٹ سکے اسٹریٹی بابا بابا درہنہ سہ ماہی  
 خرابی یہ بیان پولیس سٹیشن اسٹریٹی بابا میں تعلق ترقی میں ہے۔ وقت 16:20 بجے  
 مورخ 23 تاریخ سال 1373 نمبر کو میر عیاس علی بٹنٹ نے سکے اسٹریٹی بابا میں نمبر 5708179  
 ر اطلاع دی کہ میر والی علی محمد بٹنٹ کو مورخ 23 بجے واقع بابا میں واقع بابا  
 بابا میں واقع بابا کے نزدیک میر علی اسٹیشن مارٹرنگ کے قتل کو دیا گیا ہے۔  
 اس وقت رپورٹ میں تھا کہ میں 14:05 بجے سکے اسٹریٹی بابا میں واقع بابا میں  
 مورخ 23 بجے کو گھر میں تقریباً 19:25 منٹ پر کھانا کھا رہا تھا کہ میر عیاس علی بٹنٹ  
 گھر کے بیچے کو طرف کا بائیں طرف والا دروازہ زرد رنگ کا کھٹک جو کہ اوپر اور چھٹا کھٹک  
 درختوں کا چھترہ طرف کے طرف سے میر عیاس علی بٹنٹ آیا۔ کھٹک کے والے کی آواز  
 سنائی دے گی میر والی میر عیاس علی بٹنٹ سے باہر لکھے تو میر عیاس علی بٹنٹ  
 منٹ کے بعد میر عیاس علی بٹنٹ کو مارٹرنگ کے طرف سے باہر لکھے تو میر عیاس علی بٹنٹ  
 کھٹک کی طرف سے سنائی گئی میر عیاس علی بٹنٹ کی حالت میں میر عیاس علی بٹنٹ  
 کے گھر میں کھٹک کے چھترہ کے طرف سے میر عیاس علی بٹنٹ کے گھر سے باہر لکھے اور خرابی ہو گئی اس کے بعد  
 وہ باہر کھٹک کے طرف لکھے میر والی علی محمد بٹنٹ کو خون میں لٹ پٹ زمین پر لکھے  
 سکے اسٹریٹی بابا میں یا بابا تقریباً 20:05 منٹ پر کھانا کھا جانے وقت میر عیاس علی بٹنٹ  
 میر عیاس علی بٹنٹ کو سکول ہسپتال اسٹریٹی لے جایا گیا تاکہ لوہڑی محلہ نمبر 2  
 بجے تاریخ 24 کی صبح میر والی وقوع پر دم توڑ چکے تھے میں اس دوران رپورٹ دی

سے جو کہ اس کے برائے فتح گمشدہ، خوشی، نگرانی، جان نثاران اور شمالی علاقوں میں بند ہوئے۔  
 کسب سے بڑے برائے فتح گمشدہ، اڈاک، ایشاور، کولم، اور الرزقی انما اس 115  
 لوہیں ایشور الرزقی یعنی علی صبا کو توڑ کر بنایا گیا ہے۔ اسے نگرانی بند رکھا جائے  
 خود لوہیں ایشور ان کے والہ کی قتل کی رپورٹ اور رزاقان رزاقان رزاقان رزاقان  
 میں جوڑم باجہ مارچ 2013ء کو فوت ہوئے۔ 09:00 بجے علی صبا کی قتل کے  
 سائے میں رہا اور رپورٹ کی تیار کر کے لوہیں ایشور کے والد  
 صاحب کی قتل کی تصویب سندی اور وردات خلیل بزرگ علی صبا کے والد  
 میں بڑے حکام کے نمایان ذوالفقار علی عرفی، عظیم علی اور رزاقان  
 سیدان اور علی ساکنان دینہ ام رولٹ ہیں لستہ میں ان میں  
 شہزادہ نالابن خاں کینڈا بزرگ علی صبا کے والد کے قتل کرنے کا جوڑم  
 میں جوڑم باجہ مارچ 2013ء کو فوت ہوئے۔ 09:00 بجے علی صبا کی قتل کے  
 سائے میں رہا اور رپورٹ کی تیار کر کے لوہیں ایشور کے والد  
 صاحب کی قتل کی تصویب سندی اور وردات خلیل بزرگ علی صبا کے والد  
 میں بڑے حکام کے نمایان ذوالفقار علی عرفی، عظیم علی اور رزاقان  
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 شہزادہ نالابن خاں کینڈا بزرگ علی صبا کے والد کے قتل کرنے کا جوڑم  
 میں جوڑم باجہ مارچ 2013ء کو فوت ہوئے۔ 09:00 بجے علی صبا کی قتل کے  
 سائے میں رہا اور رپورٹ کی تیار کر کے لوہیں ایشور کے والد  
 صاحب کی قتل کی تصویب سندی اور وردات خلیل بزرگ علی صبا کے والد  
 میں بڑے حکام کے نمایان ذوالفقار علی عرفی، عظیم علی اور رزاقان  
 سیدان اور علی ساکنان دینہ ام رولٹ ہیں لستہ میں ان میں  
 شہزادہ نالابن خاں کینڈا بزرگ علی صبا کے والد کے قتل کرنے کا جوڑم

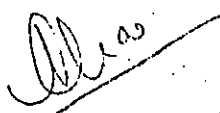
ان کو جلد رولٹ سنا کر کے الہ  
 Major Abbas Ali Bangash  
 DR-376  
 خلیفہ کے تعلق سے جوڑم باجہ مارچ 2013ء کو فوت ہوئے۔ 09:00 بجے علی صبا کی قتل کے  
 سائے میں رہا اور رپورٹ کی تیار کر کے لوہیں ایشور کے والد  
 صاحب کی قتل کی تصویب سندی اور وردات خلیل بزرگ علی صبا کے والد  
 میں بڑے حکام کے نمایان ذوالفقار علی عرفی، عظیم علی اور رزاقان  
 سیدان اور علی ساکنان دینہ ام رولٹ ہیں لستہ میں ان میں  
 شہزادہ نالابن خاں کینڈا بزرگ علی صبا کے والد کے قتل کرنے کا جوڑم

اطلاع کے لیے اطلاع دینا کہ دستخط ہو گیا یا ان کی ہر بات نشان لگا یا جائے گا۔ اور انہیں تحریر کرنے اور اطلاع کو دستخط بطور تصدیق ہوگا  
 13-24-13  
 24-13-13  
 اطلاع کے لیے اطلاع دینا کہ دستخط ہو گیا یا ان کی ہر بات نشان لگا یا جائے گا۔ اور انہیں تحریر کرنے اور اطلاع کو دستخط بطور تصدیق ہوگا

Supplementary Statement of Major Abbas Ali Bangash s/o Ali Muhammad Bangash (deceased) aged about 36/37 years r/o Usterzai Payan Kohat (complainant) u/s 164 Cr.PC on oath:-

Stated that in the FIR , I had charged Zulfiqar Ali alias Bhutto , Riaz Ali, Mazhar Ali s/o Nadir Ali r/o Usterzai Payan for the murder of my father Capt(R) Ali Muhammad Bangash. Through reliable/confirmed sources/information, I have come to know that Constable Maisam Ali of Elite Police Force also fired at my father. Constable Maisam Ali was seen present around the scene of murder of my father around 19.00 hours on 23<sup>rd</sup> March 2013 by number of people. In order to carry out through investigation of the case , it is requested that Constable Maisam Ali of Elite Force be arrested so that Police is able to investigate him. I also produce 3 x photocopies of the complaints of my father which he addressed to various officials/court with regards to the life threats given to him by Zulfiqar Ali alias Bhutto and his brothers. It will amply establish the cause and motive behind the murder of my father. 2 x photocopies of the court proceedings of the legal case on "Illegal occupation of the shamilat" by Zulfiqar Ali alias Bhutto is also enclosed. This is my statement.

RO&AC  
30.03.2013

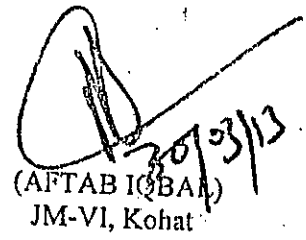


Major Abbas Ali Bangash  
CNIC No. 71103-1779702-1



(AFTAB IQBAL)  
JM-VI Kohat

Certified u/s 164 Cr.P.C.



(AFTAB IQBAL)  
JM-VI, Kohat





کوئٹہ پولیس سٹیشن جنرل جاب نمبر 2286/13 قلم نمبر 20.06.2011 لی فورا (قلم نمبر جاری) ضمنی قلم (پولیس)

قلم نمبر ۲۲-۵ (۱)

م نمبر ۴۳

**ابتدائی اطلاعی رپورٹ** - 1982302 - 14701-KP

ابتدائی اطلاع بابت جرم قابل دست اندازی پولیس رپورٹ شدہ ڈاکوئیٹ نمبر ۵۵۸/۱۱۷۲/۲۰۱۴

ضلع کوئٹہ	سٹی
تاریخ ۲۱/۱۱/۲۰۱۴	539
تاریخ 24/11/2014	تاریخ 29/11/2014
وقت 16:00	وقت 29/11/2014
اطلاع دہندہ مستفیض	اطلاع دہندہ مستفیض
نام جرم (مورد فوجداری) حال اگر کچھ لیا گیا ہو۔	کسٹم کریمل عباس علی بیگم کی راکٹ کی ایک ڈکھائی
بہ فاصلہ تھانہ سے اور سمت	352 506
نام ملزم	عبدالکرم صالحہ صالحی کوئٹہ
واقعیات سے متعلق کی گئی اگر اطلاع درج کرنے میں تاخیر ہوئی ہوگی تو اس کی وجہ لکھنی ہوگی	میں تاخیر سے اطلاع دینے کی وجہ سے
رواگی کی تاریخ و وقت	۲۱/۱۱/۲۰۱۴ ۱۶:۰۰

**ابتدائی اطلاع نیچے درج گروپ کے افسر صاحب سے**  
 سہ ماہی ملزم خان کے بارے میں 26 دسمبر 2014ء کو کوئٹہ پولیس کے ذریعے ایک اطلاع ملی تھی جس میں ملزم خان کی شناخت کی گئی تھی۔ اس کے بعد پولیس کے افسران نے ملزم خان کے بارے میں مزید تحقیقات کی ہیں۔

Use of Force Language on 20/11/2014  
 20/11/2014  
 accused Zulfikar Ali Alias Butt S/O Madad Ali Resident of Usterzai Poyan Kohat KPK. CNIC 11301982302. I with due respect it is reported that above named accused is nominee for murder of my father Captain Ali Muhammad Bargarhi in FIR No 80 dated 24/3/2013 Lodge ups 302-34-109 P.P. Usterzai Kohat KPK. The accused is presented on bail however I have moved the BEA No 1683/14 dated 11/10/2014 in PCC Pestawar which is pending adjudication before chief Justice on 21 November 2014. The BEA was affixed before chief Justice PHA. The above named accused was sitting out side court No 1 along with a suspicious person with whom he was intimately conveying in the past. The accused party had been bringing paid assassins/terrorists to the court premises for my recognition for target killing in one such instance the accused had brought a terrorist to the Kohat Courts, who made my PCC video for recognition.



Complaint To This effect is attached with the  
 BCR Page NO 631 My letter dated 17 September 2014  
 in this retrospect I requested the Police outside  
 court NO 1 to ascertain the identity of suspicious  
 person who was sitting on one bench on my request  
 the Police started checking the identity of the  
 suspicious person. The accused person was  
 bothering/talking to the accused. The accused  
 promptly got up from his seat. Started using foul language  
 towards me. Upon his foul language I moved towards  
 the DSP Security office to report to him. When I  
 came back the accused was already sitting inside  
 the court NO 1 when I sat on the seat in the court  
 the accused angrily look towards me and  
 threatened me by saying that he would see me  
 outside the court. Even the recorder of court  
 NO 1 had to silence the shouting accused. I  
 immediately and informed him who then spoke to  
 Mr Ghulam Nabi on my mobile number and  
 passed some instruction.

Above in view following is requested due notice of  
 the reported incident may please be taken by registering  
 in my complaint in Police station record. In future a  
 police guard may please be exclusively detailed on  
 my security in the court premises both in sessions  
 court and HC as I am facing life threats forwarded for  
 legal action and registration of report in Police  
 station record. Signature Lt Col Amir Ali Bangash

شاد محمد

Shad Mohd  
 S/PSECUT  
 27/11/14

اطلاع کے لیے اطلاع دہندہ کا دستخط ہوگا یا اس کی مہر یا نشان لگایا جائے گا۔ اور اس تحریر کنندہ ابتدائی اطلاع کا دستخط بطور تصدیق ہوگا۔ حروف الفبایا پھر شرح روشنائی = ایک بلزم یا شہر علی الترتیب واسطے باشندگان علاقہ غیر یا وسط ایشیا یا افغانستان جہاں موزوں ہوں، لکھنا چاہئے۔

اینکوزین پولیس بھون سورت نمبر ۲۲

ابتدائی اطلاعی رپورٹ

کنٹر 887

نام نمبر ۲۲، ۱۵۰  
۵۵۵ ۱۵۵۵۵۵  
۱۴۳۰۱-۲۳۱۲۹۴۱-۵

(قائین) ابتدائی اطلاع نسبت مجرم تاجین دست از بازی پولیس بھون شہزادہ رقم ۱۵۲ مجموعہ مطابق توپیری  
تھانہ آسٹریلی مینے کوہٹا

نمبر 37 تاریخ و وقت وقوع ۰۸/۱۷ ۰۶ وقت ۱۷:۳۰ بجے

تاریخ و وقت رپورٹ ۰۸/۱۷ ۰۶ وقت ۱۸:۲۵ بجے	۱۸ بجے جلالدینی پیر پیر	۰۶ وقت ۱۸:۵۵ بجے
نام و سکونت اطلاع دہنہ و مستیف	۵۵۵۵۵۵۵۵۵۵۵۵	تھانہ آسٹریلی
محقق کیفیت مجرم (مورد رقم) حال اگر کچھ یا گیا ہو	Re 302	
جائے وقوع فاصلہ تھانہ سے اور سمیت	خانہ - ادیح خانہ، کھانہ، آسٹریلی بیلین خانہ عربی از تھانہ بیلین	
نام و سکونت ملزم	۱۴۳۰۱، ۱۴۷، ۱۵۸۶-۷ ۵۵۵۳۹۶۵۰۳۵۵	محبوب عالم خان عرف خالد ولد مشاہد عالم خان تھانہ آسٹریلی
کارروائی پولیس کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہو اور تو ذکر بیان کرو۔	پوسٹی میں داخلہ ہو اور سپیل رپورٹ پر تیار کیا جائے۔	
تھانہ سے روانگی کی تاریخ و وقت	دھود سہیل رپورٹ	

**ابتدائی اطلاع تھانہ درج کرو**  
 ضروریات کے لئے اطلاع دہنہ کے متعلق ملزم کے والدین کو مطلع کیا گیا ہے اور ان سے ملزم کے بارے میں جانچا گیا ہے۔ ملزم نے اپنے والدین کو بتایا ہے کہ وہ اس وقت آسٹریلی میں مقیم ہیں۔ ملزم کے والدین نے کہا ہے کہ وہ ملزم کے بارے میں کچھ نہیں جانتے۔ ملزم کے والدین نے کہا ہے کہ وہ ملزم کے بارے میں کچھ نہیں جانتے۔ ملزم کے والدین نے کہا ہے کہ وہ ملزم کے بارے میں کچھ نہیں جانتے۔ ملزم کے والدین نے کہا ہے کہ وہ ملزم کے بارے میں کچھ نہیں جانتے۔

زبرد حافظت کیلئے خود ایجاد ۱۸۱۳ MS۱۱۱۱ میں سال دو ماہ کی کتب کو  
 دیکھ کر دیکھ کر یہ ہے کہ یہ کتابیں بالائی یا نیچی یا کتبی کے جس طرح کی  
 خطوں کو پیش کر کے ان میں سے کچھ بھیج کر اس کی اصل میں  
 خطوں کو دیکھ کر یہ ہے کہ یہ کتابیں جو کہ ۱۸۱۱ء کو اس کی اصل میں  
 خطوں میں سے کچھ بھیج کر اس کی اصل میں اس کی اصل میں  
 اس کی اصل میں اس کی اصل میں اس کی اصل میں اس کی اصل میں  
 اس کی اصل میں اس کی اصل میں اس کی اصل میں اس کی اصل میں  
 اس کی اصل میں اس کی اصل میں اس کی اصل میں اس کی اصل میں

Dr. J. J.  
 H. C. P. S. 1  
 6-3-17

استری

دستخط  
 عہدہ

اطلاع کے لیے اطلاع دینا کہ دستخط کیا گیا۔ اس کی ہر بات کو بجا لیا جائے گا۔ اور اگر کوئی اور کوئی چیز لکھی جائے گی۔  
 حروف الفبا میں اس کے ساتھ سے ہاتھ لگانا نام پر ایک مندرجہ ذیل کے تحت لکھ کر اس کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ  
 لکھا جائے گا

بیتاں ۱۶۶

مکتبہ بان کما کہ مکتبہ حیات شہزاد  
 مری بسا ہی تاریخ 2/2/2017 کو گرداغم استریک ہوا  
 میں سوچ رہی تھی کہ میں اور بہرہ دہانی پر رشتہ میں سوچ رہی  
 اور مری مکتبہ حیات مری سے ہم آہنی۔ اس دوران جہاد  
 ام محبوب عالم ولد شاہ عالم کٹر رہا آیا اور حیات لیا  
 کہ جہاں شاہ عالم بیٹے آئے ہیں صلت مری بات کرنی  
 ہے۔ بسن کر میں ہم آہ مکتبہ حیات سے مکتبہ میں  
 آگے کو دیکھا کہ جہاں شاہ عالم کے ہم آہ منظم ملی فان جہا  
 ولد فرعی، مامون ریاض علی، مامون ذوالفقار علی  
 ولد نادر علی، مامون ڈاکٹر علی، میران علی ولد ریاض علی اور  
 جہاد جہاد ولد شاہ عالم پہلے سے سوچ رہے۔ صابری استقامت  
 جہاں شاہ عالم نے بات شروع کی کہ جہاں شاہ عالم سے ملازمت  
 کو شروع اس سے علاقہ میں ہماری بہائی سروس سے لہذا بہائی سروس  
 کے لیے میں تمام لوگ اس میں شامل ہو گئے۔ جو اب میں  
 کے لیے وہ ملازمت میں پھرتے گی اور حیات میں میران  
 حیات میں ہے۔ اس دوران جہاد جہاد جہاد جہاد جہاد  
 کے لیے حیات میں اور حیات میں حیات میں حیات میں حیات میں  
 گیارہ چار گویاں گئے صابری گری جہاں جہاں  
 حیات میں حیات میں حیات میں حیات میں حیات میں حیات میں

2/2/2017  
 BINA MUHAMMAD SUHAIL RAZI  
 0300-2222222  
 BINA

8309

میں سے علم علی اور شہد علی بھی نام لے کر ہے۔ صفحہ 10  
کو گولیاں مارنے کے بعد ساتھ عالم اور معلم علی بہت سے  
کمرہ نمک آئے اور مجھے منع کیا کہ تم نے دقوی کی رپورٹ

سہرا کی - تم فوراً مٹانے کا نہیں گے۔ مسلمان کے گھر سے  
0922-580218  
فلج ہانے کے بعد میں نے تمہارے کسٹم خوں بن  
پراسٹریٹ کے کھانے کو یا اور دقوی کا بتایا۔ کچھ بہ کے بعد  
پلیس آئی تو یہاں دوبارہ تمہارے کھانے کو یا اور نہر کا

کمرہ کے علاوہ کسی کمرے پر رپورٹ درج نہیں  
کیوں کہ مجھے اندیشہ تھا کہ مسلمان کسٹم خوں بن پر علاوہ  
درج ہوگی۔ ہر حال ایک گھنٹے کے بعد پولیس آگے۔

اس دوران مسلمان گھر کے بعد موجود رہے اور مجھے  
نام نقل سے منع کیا۔ میں صحت پر کے نام آئی اور پولیس  
نام نقل سے منع کیا۔ Stho نام خوں بن درج نہیں کیوں اسکندری

کو گھر کے اندر بلا کر تو پولیس کو یہاں سارے دعوے کو بتایا  
میں نے تو اندر گیا۔ پولیس کو یہاں سارے دعوے کو بتایا  
دوران بیان مسلمان میں سے تھا کہ صاحب نام ہے لوہیلہ

پروور رہے اور مجھے بتاتے رہے کہ صاحب نام ہے مسلمان  
میں نے سب عام کام کو۔ نام میں سے صاحب مسلمان  
میں نے سب عام کام کو۔ نام میں سے صاحب مسلمان


Stho کو بتایا۔ لیبار فیکٹری رپورٹ سرکارہ  
Stho نے مجھ سے دستاویز دیئے۔ پورا میں سے  
میں نے سب عام کام کو۔ نام میں سے صاحب مسلمان  
میں نے سب عام کام کو۔ نام میں سے صاحب مسلمان



890

جس سے میں دن بدم سرم 2017 6 و 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31  
 فان صارتے مگر آئے اور واقعے کی تعینل جمعے پر نہیں۔ جسے  
 سارا ماجرا میں سماتا SP مامیہ کے کہہ کر آئیگی  
 رپورٹ میں تو صرف ایک ملزم کی موجودگی کا ذکر ہے  
 کہ ازان انکوائری کے کہہ کر اس بات پر ایمان رد ہوا  
 عدالت قلم کر میں۔ میں ساقم داری کی بنا پر گری  
 میں نکل سکتی تھی دوسرا مہرے کان کو ضربات لاقوتی۔  
 امروزہ پولیس کی حفاظت میں عدالت آگے میں اور چوٹی

- میرا بیان تمہارے بیان کے راجح ہے  
 میں ملزمان 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100
- 3) سہ عالم کان ولہ فرمیلی 3) مسلم علی دلہ فرمیلی
  - 4) میران دلہ ریاض علی 4) حیم علی دلہ ریاض علی
  - 5) ذوالفقار علی دلہ نادر علی 5) ریاض علی دلہ نادر علی
  - 6) حار عالم ولہ سہ عالم کان پر اپنے پھڑہ خاندان
  - 7) حار عالم پر قتل کی دہم داری کرتے ہیں۔ ملزمان
  - 8) با اثر ہیں لہذا جیسے ان سے تمہاری رہا جائے سارے
  - 9) انہیں حار واقی لڑا دی جائے۔

  
 14/12/2017  
 PAFK HONORABLE JUSTICE TAJU  
 Qazi Court, Lahore, Pakistan

دستخط: - رضین شاہ  
 CNIC: 14301-2342941-0  
 Sadeeqia - taroqi CNIC  
 farheen shah  
 RO9 AC,  
 Resaved XX

Meisam Ali

Following picture depicts the overall criminal mindset of this family



Accused Riaz Ali ; Meisam Ali & Zulfiqar alias Bhutto



(این) ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس پورٹ شروع شدہ دفعہ 104 اور ضابطہ نو جاری

مقامہ ایسٹریٹ

منبع کو جمع

نمبر 195 تاریخ وقت وقوع 14 16 بجے وقت 10/15

تاریخ وقت وقوع 14 16 بجے	14 جون 2015
نام و سکونت اطلاع دہندہ و متنبہ	114301-11173337-7
مختصر کیفیت جرم و صورہ حال اگر گہرا یا گیا ہو	انسپکٹر ناظر حسن SHo
جائے وقوع نامہ مقامہ سے اور سمیت	15AA انگریز بس اسٹاپ، 30 بلور بلا، غیر منظم، پانچ کرائڈ
نام و سکونت المزم	خانہ اذان P مظہر علی اور تھوڑے سا کونڈے
کارروائی پوٹیش کے متعلق کی گئی اگر اطلاع درج کرنے میں تاخیر ہو تو وجہ بیان کرو۔	P مظہر علی، ولد نادر علی، مسکنہ آسٹریٹک، پانچ
مقامہ سے روانگی کی تاریخ و وقت	14 جون 2015

**ابتدائی اطلاع نیچے درج گرواں وقت ایکے تحریری مراسلہ مفاہت**

انسپکٹر ناظر حسن SHo بدست جمیل خالد 26 افریل 2015 کو درج ذیل ہے۔ مگر تھانہ اور فزس مسام اسٹیشن خانہ 15AA کے متعلق 199، جمیل خالد 26 افریل 2015 کو غیر تحریری پولیس کے بسلسلہ سراج اینڈ سٹریٹس ایئر لائنز علامہ میں موجود تھا۔ کہ مخبر نے اطلاع دی کہ مجرم اسٹیناری مظہر علی ولد نادر علی مسکنہ آسٹریٹک پانچ جو بحوالہ مقدمہ مسکنہ 30 ج خرخر 24/13 جم 302/134 P تھانہ آسٹریٹک میں حسرتی گرفتاری مطلوب ہے۔ خانہ خود میں موجود ہے۔ اطلاع کو مصدقہ جانا کو سہراہ۔  
 تحریری لیکچر کنٹریل ناد پوٹیشن 4/8 کے P مذکورہ کے گھمیر چھا پہ گنایا گیا P میں موجود پایا۔ البتہ دوران خانہ تلاشی P کے کوئلہ رکھائی سے انگریٹ بسٹوک 30 بلور بلا غیر منظم چاہئے کہ کارٹوس 30 بوز بوز کر مہرے غیر مہرے پورٹیشن کر کے مظہر علی کو مہرے جرم بالاکہ مہرے جس کی گرفتاری درمیش ہے۔ مراسلہ بدست جمیل خالد 26 افریل 2015 ارسال تھانہ ہے۔  
 لکھتیس حوالہ 15AA کی سٹیف کیا جائے دستیظہ انگریز مسام انسپکٹر ناظر حسن SHo تھانہ آسٹریٹک مورخہ 14 16 بجے کارروائی تھانہ احمدہ مسام صرفا بحرف ادرن بالا مع تھانہ پانچ ایس بالاکہ کسے ہو کر نقل پانچ مسام مراسلہ لکھتیس حوالہ KBI سٹاف کیا جائے پانچ پانچ پانچ ہے

Attested  
 Ghayoor ul Hassan  
 Additional Magistrate  
 District High Court  
 District Courts Kohat

PRINT ON CARD



دوست محمد ولد میاں محمد، پتہ: ڈاک خانہ پنڈی گھیب، راول، تحصیل پنڈی  
گھیب، ضلع انک، پیشہ: مزدوری  
شناختی کارڈ نمبر: 7-5795234-37105 فون نمبر: 03009140967  
مرتبہ مرسلہ: محمد نواز ASI تھانہ فتح جنگ

نام و سکونت اطلاع دہندہ مستفیث

مختصر کیفیت جرم (معدہ دفعہ) و مال اگر کچھ کھو گیا ہے

جرم:

392 ت پ

پک اپ: قیمت - 710000 - رجسٹریشن نمبر RIS-15-476 - انجن نمبر -  
چیسس نمبر

موبائل: Q موبائل 1 عدد - قیمت - 7000

روپیہ: - قیمت - 19000

بحد رقبہ صدکال بقاضلہ 4 کلو میٹر جانب شمال دیہہ نمبر 33



جائے وقوعہ و فاصلہ تھانہ سے اور سمت

حسب آمد استغاثہ مقدمہ درج رجسٹر ہوا

کارروائی متعلقہ تفتیش اگر اطلاع درج کرنے میں کچھ توقف ہوا ہو تو اس کی وجہ بیان کی جاوے

ٹیلی فون نمبر: 03435726822

عہدہ: SI

بیلٹ نمبر: 933/R

(ابتدائی اطلاع نیچے درج کریں)

محمد اقبال

اذان دوست محمد ولد میاں محمد قوم اعوان سکندہ راول پنڈی گھیب بعر 46/47 سال موبائل نمبر 03009140967 شناختی کارڈ نمبر 37105.5795234.7 بیان کیا کہ میں سابقہ فوجی اور راول کارہائشی ہوں میں نے مزدوری کیلئے ذاتی گاڑی سوزوکی پک اپ نمبری RIS/476 ماڈل سے 2015 مالیتی -/710000 رکھی ہوئی ہے آج سے تین دن پہلے میں سوزوکی لیکر نکال آیا تو فتح جنگ سے ایک نامعلوم پٹھان نے صدکال سے پنڈی گھیب کیلئے کبھی فارم لے جانے کیلئے -/3000 روپے بلگ طے ہوئی جو میں صدکال سے کبھی فارم لوڈ کر کے پنڈی گھیب نالہ کے پاس فارم چھوڑ کر آیا تو اس وقت اس نامعلوم آدمی نے مجھے اپنا موبائل فون 03369969669 اور میرا موبائل فون نمبر 03009140967 نوٹ کر لیے تاکہ دوبارہ ت پڑی تو نکال کر لیا جو کل مورخہ 26.09.2017 بوقت -/5 بجیشام تقریباً مجھے موبائل فون نمبر 03478215811 سے کال آئی اور مجھے کہا کہ میں کبھی فارم والا پٹھان بول رہا آج پھر صدکال سے کبھی فارم لوڈ کر کے پنڈی گھیب لیکر جانا ہے لہذا آپ گاڑی لیکر آجائیں چونکہ کرایہ پہلے سے طے تھا جو میں نے اپنے ساتھ اپنے بھانجے غضنفر علی ولد غلام مہندی لکھا ساکن پرانہ پنڈی گھیب کو ساتھ لیکر سوزوکی لیکر فتح جنگ تقریباً -/8 بجے رات پہنچا تو فتح جنگ چوک میں نامعلوم پٹھان جو کہ موبائل پر رابطہ میں تھا انتظار کر رہا تھا جو ہمارے پیٹھ گیا اور صدکال کی طرف چلنے کو کہا جہاں سے پہلے فارم لوڈ کیا تھا جانے کو کہا ہم سوزوکی لیکر صدکال سے جانب شمال رکھ جنگل کی طرف چل پڑے جو تھوڑے فاصلہ جہاں سے فارم لوڈ کیا تھا دو نامعلوم پٹھان کھڑے تھے جو ساتھ بیٹھے آدمی نے گاڑی رکوا کر ان کو بھی ساتھ بٹھا لیا اور مزید آگے جانے کو کہا تو تقریباً ڈیڑھ کلو میٹر مزید جنگل میں جا کر تینوں گاڑی روکائی اور ایک نے ہینڈل نکال کر جان سے مار دینے کی دھمکی دیکر مجھے زبردستی گاڑی سے نیچے اتار دیا اور ایک نامعلوم پٹھان گاڑی چلا کر وہاں سے گاڑی بھاگ کر لے گیا جبکہ دو م آدمی جن میں سے ایک کے پاس ہینڈل تھا دونوں نے ہمیں جان سے مار دینے کی دھمکی دی اور ہماری چادر پھاڑ کر ہم دونوں کے ہاتھ پیچھے باندھ دیئے اور دونوں کے پاؤں بھی کر ہم پر ہینڈل تان کر ساری رات کھڑے رہے کہ اگر کوئی حرکت کی تو گولی مار دیں گے ساری رات پہرہ دیتے رہے اور صبح اذان کے بعد دونوں نامعلوم آدمی ہمیں چھوڑ کر جنگل میں سے سمیں نکال کر مجھے واپس دے دیں زبردستی ہمراہ لیکر چلے گئے ہیں ان دونوں ملزمان کے جانے کے بعد ہم دونوں کوشش کر کے اپنے آپکو آزاد کروا کر برائے رپورٹ آیا ہوں تینوں ملزمان جو شکل صورت سے نوجوان پٹھان معلوم ہوتے تھے جنکو سامنے آنے پر ہم دونوں بخوبی شناخت کر سکتے ہیں قانونی کارروائی کی جائے العبد دستخط بحروف انگریزی ت محمد تصدیق شد محمد نواز ASI کارروائی پولیس سائل مندرجہ بالا نے بحاضری تھانہ آکر بیان بالا تقریری دیا جو مذکورہ کو پڑھ کر سنایا و سمجھایا گیا جس نے صحت بیان خود کو درست کرتے ہوئے اپنے دستخط بحروف انگریزی کر دیئے جنگلی میں تصدیق کرتا ہوں بیان سائل و حالات واقعات سے درست صورت جرم 392 ت پ پائی جا کر بیان بشکل استغاثہ بغرض ج مقدمہ حوالے محرر HC/574، نیاز احمد C/1759 کے بسلسلہ تفتیش روانہ ہوتا ہوں دستخط اردو و انگریزی محمد نواز ASI تھانہ فتح جنگ 27.09.2017 از تھانہ بوقت 8/15 بجے HC/ناہد حسین HC/574، نیاز احمد C/1759 کے بسلسلہ تفتیش پرست تو شیر عباس C/2290 محمد نواز ASI بھجوائی جا رہی ہیں نقول FIR بشکل

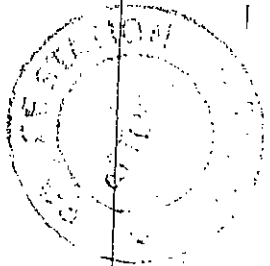
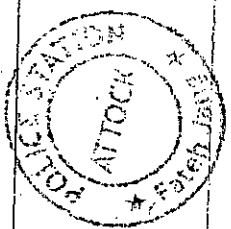
رپورٹ آمد استغاثہ رپورٹ ابتدائی ہذا جرم مذکور مرتب ہوئی اصل استغاثہ مع نقل FIR برآمد تفتیش پرست تو شیر عباس C/2290 محمد نواز ASI بھجوائی جا رہی ہیں نقول FIR بشکل

رپورٹ آمد استغاثہ رپورٹ ابتدائی ہذا جرم مذکور مرتب ہوئی اصل استغاثہ مع نقل FIR برآمد تفتیش پرست تو شیر عباس C/2290 محمد نواز ASI بھجوائی جا رہی ہیں نقول FIR بشکل

تاریخ: 17-9-74

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<p>سمران بھروسہ</p>	<p>بلزمان جو چالان کیے گئے</p>	<p>تفصیل برائے</p>	<p>نام و پتہ گواہان</p>	<p>مختصر حالات مقدمہ جرم دفعہ 392</p>
<p>پہلے گئے ہوں</p>	<p>زیر حراست بر ضمانت</p>	<p>تفصیل برائے</p>	<p>نام و پتہ گواہان</p>	<p>مختصر حالات مقدمہ جرم دفعہ 392</p>
<p>...</p>	<p>...</p>	<p>...</p>	<p>...</p>	<p>...</p>



کے پاس 33000 روپے...  
 392 دفعہ جرم مقدمہ  
 27/11/74 کو کھانے پر  
 50 سوڑے تیل کے برتنوں  
 سے ملے ہوئے تھے  
 اور انہوں نے کہا  
 کہ یہ سب ان کے پاس  
 تھا۔

1) دو سہولت خوردہ مال کے لئے  
 (2) جے ایچ ایف کے لئے  
 (3) جے ایچ ایف کے لئے  
 (4) جے ایچ ایف کے لئے  
 (5) جے ایچ ایف کے لئے







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**PERS CONFD**

Col Abbas Ali Bangash  
(Complainant in FIR No-80)

Contact : 03005708179

Dated : 20 Feb 2024

- List-1:(1) Inspector General Police, KPK (CPO Peshawar) (2) RPO/DIG Kohat  
(3) DPO Kohat (4) AIG Establishment, CPO Peshawar (5) DSP Legal, Kohat  
(6) Reader /SRC/OHCL/LO & Pay Order (7) Home Secretary KPK (Home Office)  
(8) Head of Legal Branch, KPK Police; CPO Office , Peshawar

- List-2:(1) Governor KPK  
(2) Chief Minister KPK  
(3) DG Prosecution KPK  
(4) Chairman KPK Service Tribunal, Peshawar  
(5) Advocate General, KPK Service Tribunal, Peshawar  
(6) Registrar KPK Service Tribunal, Peshawar  
(7) Assistant Registrar, KPK Service Tribunal  
(8) All concerned Intelligence Agencies

Subj: **Dismissal (Major Punishment) of No-963/1192 Ex Police ELITE Force Constable Meisam Ali s/o Riaz Ali (CNIC No -14301-7690552-5) from Police Department vide DPO Kohat Order No- OB No-830/ 5901-04 dated 24 November 2020 for his involvement in 2 x murder FIRs i.e FIR-80(u/s 302/34/109 PPC) dated 24 March 2013 & FIR-37 (34/302PPC) dated 06 Feb 2017 FIR-80 + His 1<sup>st</sup> Appeal before KPK Service Tribunal 1273/2017 + Ex-55/24 in 1273/17 + 2<sup>nd</sup> Appeal 224/24**

Reference : My letter dated 11 Jan 2024 on the subject

1. With due respect, it is stated that No-963/1192 ; Ex Police Constable Meisam Ali s/o Riaz Ali (Dismissed from Police service) had been charged alongwith other Co accused for 2 x murders as per 2 x separate FIRs (all blood relatives including his father brother & uncle) as under :-

- a. **FIR-80 (u/s 302/34/109 PPC)** dated 24 March 2013 at PS Usterzai, Kohat Brutal Murder of my father namely Capt Ali Muhammad Bangash (deceased).
- b. **FIR-37 (u/s 302/34 PPC)** dated 06 Feb 2017 at PS Usterzai Kohat - Brute Murder of a lady named Mst Hina Shahnawaz (deceased).

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2. Chronology/background of the subject case is as under :-

Ser	Date	Details
a.	06/7/07	Recruitment of Constable Meisam Ali in KPK Police
b.	24/03/13	<b>FIR#80</b> FIR#80 (u/s 302/34/109 PPC) dated 24 March 2013 - Murder of Capt Ali Muhammad Bangash
c.	20/5/13	Police Inquiry Officer recommended to keep the inquiry pending
d.	17/10/14	Meisam Ali was reinstated into Service wef 17 Oct 2014
e.	06/02/16	Constable Meisam Ali was suspended from service
f.	06/02/17	<b>FIR#37</b> FIR#37 (u/s 302/34 PPC) dated 06 Feb 17 was lodged wherein Meisam Ali was charged for the brutal murder of Hina Shah Nawaz
g.	14/2/17	Meisam Ali was charged in CrPC-164 Statement of Mst Farheen
h.	04/05/17	<b>1<sup>st</sup> Dismissal Order of Meisam Ali from Police</b> Meisam Ali had been dismissed from Kohat Police by DPO Kohat for his proven involvement in Case FIR#37
i.	05/05/17	Meisam Ali was granted Bail by the Court
j.	16/05/17	Meisam Ali filed Department Appeal before DIG/RPO Kohat
k.	10/9/17	Meisam Ali filed Appeal before IGP KPK under Rule 11-A of KPK Police Rules-1975
l.	18/10/17	Meisam Ali's Appeal before IGP KPK was dismissed
m.	15/11/17	<b>Appeal before KPK Service Tribunal</b> Meisam Ali filed an Appeal No-1273 /2017 before Service Tribunal KPK
n.	21/9/19	Acquittal of Meisam Ali in FIR#37 as result of compromise
o.	01/7/20	As per Order of Service Tribunal, his appeal was admitted and he was re-instated into service
p.	27/7/20	Service Tribunal letter to IGP KPK about re-instatement of Meisam Ali
q.	06/8/20	Police Order for his re-instatement into Service
r.	20/8/20	Meisam Ali asked Police for reimbursement of his back benefits since 05 April 2017 till 27 July 2020
s.	13/10/20	<b>Conviction of Meisam Ali in FIR#80</b> Meisam Ali was convicted in FIR No-80 (u/s 302/34/109 PPC) lodged on 24 March 2013 with award of Life Imprisonment and payment of Rs 2 Lakhs to bereaved family of deceased
t.	24/11/20	<b>2<sup>nd</sup> time Dismissal of Meisam Ali (FIR#80)</b> DPO Kohat vide his Order - OB No- OB No-830 /5901-04 dated 24 November 2020 has dismissed Meisam Ali for the 2 <sup>nd</sup> time upon his conviction in Case FIR#80 <b>(Attached)</b>
u.	28/2/23	Peshawar High Court, Peshawar while disposing off connected appeals had remanded the trial of accused on a minor anomaly to Court of Session Judge Peshawar only to procure the triplicate copies of statements of all DWs.
v.	16/9/23	<b>Acquittal in FIR#80</b> Meisam Ali was acquitted by the Court of Session Judge Peshawar despite no addition of any evidence. Same DWs statements were transposed with not an iota of additional evidence
w.	05/10/23	<b>Cr Appeal against Acquittal No-1398 against acquittal of Meisam Ali, Riaz Ali and Zulfiqar Ali alias Bhutto was filed at Peshawar</b>

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<b>High Court Peshawar</b>		
x.	05/10/23	<b>Appeal against Acquittal at Peshawar High Court, Peshawar</b> Complainant in case FIR-80 Col Abbas Ali Bangash filed an Appeal against Acquittal of Meisam Ali against the Impugned Judgement of Session Judge Peshawar and so far the case has been affixed on following dates with admission on 18 Jan 24 for hearing. <b>(Institution Slip No - 38765 dated 05 Oct 23 is attached)</b>
y.	09/1/24	<b>Appeal for Execution Order No-55/2024 by Meisam Ali</b> Meisam Ali's petition for Execution Order before Service Tribunal KPK in connection to Appeal No-1273/2017 <b>(Attached)</b>
z.	15 Feb 24	<b>Cr Appeal Against Acquittal -1398</b> against acquittal of Meisam Ali, Riaz Ali & Zulfiqar Ali alias Bhutto has been admitted by the Honorable Peshawar High Court ; hence suspending the Judgement of Session Judge Peshawar dated 16 Sep 2023.

3. Details of Dismissal Orders of Meisam Ali are as under :-
- 1<sup>st</sup> Dismissal Order** by DPO Kohat dated 04 May 2017 for his involvement in the murder of Hina Shahnawaz vide FIR-37(302/34PPC) dated 06 Feb 2017
  - 2<sup>nd</sup> time Dismissal** by DPO Kohat OB No-830 /5901-04 dated 24 November 2020 upon his conviction in Case FIR-80(u/s 302/34/109 PPC) dated 24 March 2013 , an order which remains unchallenged till date.

4. Thus far, Meisam Ali has filed following Petitions before KPK Service Tribunal:-

Ser	Service Appeals	Details
a.	<b>Appeal No-1273/17</b> on 15 Nov 2017	Against 1 <sup>st</sup> Dismissal Order .However, Meisam Ali was again dismissed from Police on 24 November 2020 for his conviction in FIR-80.
b.	<b>Ex Order -55 /24</b> on 09 Jan 24	For claiming back benefits <b>(Pending)</b>
c.	<b>Appeal No-224/24</b> on 19 Jan 24	Against 2 <sup>nd</sup> Dismissal Order <b>(Pending)</b>

5. **Order of Peshawar High Court Peshawar.** On 15 Feb 24, the Honorable Peshawar High Court Peshawar has admitted the Cr Appeal against Acquittal No - 1398 against the acquittal of Meisam Ali , Riaz Ali and Zulfiqar Ali alias Bhutto ;hence the Order of Acquittal dated 16 Sep 24 as passed by Session Judge Peshawar stands Impugned/suspended till further Orders by Honorable High Court Peshawar. **(Copy of the Order is attached).**

6. In view of above stated facts, following is respectfully requested :-
- Appropriate comments /report for KPK Service Tribunal may be prepared at your end.
  - On 15 Feb 24, Honorable Peshawar High Court Peshawar while dealing with Cr Appeal against Acquittal No-1398 on 15 Feb 24, recorded in its Order that " *the*

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*accused were acquitted on the charge on the same set of evidence. After hearing the learned counsel for the appellant, we are of the view that the case requires re-appraisal of evidence. Admit & Notice Bailable warrant of arrest in the sum of Rs 50,000/- with two sureties each in the like amount Bonds be issued against the accused respondents to the satisfaction of Additional Registrar Judicial of this court.* This inherently means that previous Order of Session Judge Peshawar dated 16 Sep 24 has been declared as Impugned /suspended. Conviction of all accused including Meisam Ali is now obvious.

- c. Meisam Ali may not be re-instated in the Police Department & the back date benefits as demanded by Ex Constable Meisam Ali (Dismissed) wef 05 Ap 2017 till 27 July 2020 vide Appeal for Executive Order - Ex-55 /24 may not be granted to him in view of fresh Order of Peshawar High Court Peshawar on C Appeal against Acquittal #1398 on 15 Feb 24, whereby the Impugned Order of Session Judge Peshawar is now in the state of suspension & subject to review.
- d. Meisam Ali is a hardened criminal with criminal history in the area, who has always misused his employment in Kohat Police for commission of heinous crimes in the area; hence as per Police Rules, a person with such criminal mindset, doubtful integrity & character shall not continue to serve in Police. Upon his re-instatement in Police, he would further misuse the badge/uniform of Police for commission of further heinous crimes & such criminal elements within Police have always tarnished the image of Kohat Police.
- e. Given aforesaid facts, IGP KPK is requested to kindly direct AIG Establishment at CPO Peshawar, Legal Branch KPK Police, DPO Kohat & DSP Legal Kohat to prepare a proper/cohesive/consolidated report/case before KPK Service Tribunal, so as to ensure that 2<sup>nd</sup> Dismissal Order of DPO Kohat vide DPC Kohat OB No-830 /5901-04 dated 24 November 2020, as issued sequel to conviction of Meisam Ali in Case FIR-80(u/s 302/34/109 PPC) dated 24 March 2013, remains upheld & Government fund is not exhausted in terms of reimbursements of claimed back date benefits to a criminal namely Meisam Ali & the matter may be pursued at Supreme Court (Appellant Jurisdiction as

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per article 212 of Constitution) in case an adverse Order is passed by KPK Service Tribunal.

7. Next dates in following Service Petitions are mentioned against each , hence comments/report may be prepared accordingly by DSP Legal Kohat :-

- a. Service Petition for Ex Order No - Ex -55 in 1273/17 : 12 March 24  
b. Service Appeal No-224/24 : 18 March 24

8. Following documents are attached with this application for perusal at your end:-

Ser	Attachments	Flag
a.	FIR#80 (u/s 302/34/109 PPC) dated 24 March 2013 - Brutal murder of Capt Ali Muhammad Bangash (deceased)	A
b.	CrPC-164 Statement in FIR-80 of Major Abbas Ali Bangash, whereby Meisam Ali was charged for the murder of Capt Ali Muhammad Bangash(deceased)	B
c.	FIR#37(u/s 302/34PPC) dated 06 Feb 2017 - Brutal murder of Hina Shahnawaz	C
d.	CrPC-164 statement in FIR#37 whereby Meisam Ali was charged for the murder of Hina Shahnawaz	D
e.	1 <sup>st</sup> Dismissal Order by DPO Kohat as issued on 04 May 2017 by DPO Kohat (FIR#37)	E
f.	2 <sup>nd</sup> Dismissal Order by DPO Kohat as issued on 24 Nov 2020 by DPO Kohat (FIR#80)	F
g.	Execution Order # 55/2024 by Meisam Ali alongwith fake affidavit on 09 Jan 2024 before KPK Service Tribunal, wherein he concealed the fact of 2 <sup>nd</sup> Dismissal Order of DPO Kohat dated 24 Nov 2020.	G
h.	Service Appeal No-224/24 against 2 <sup>nd</sup> Dismissal Order issued on 24 Nov 2020	H
i.	Order of Peshawar High Court Peshawar on Cr Appeal against Acquittal #1398 against acquittal of Meisam Ali & others in FIR#80 dated 15 Feb 24, whereby the Order of Session Judge Peshawar dated 16 Sep 24 has been declared impugned and suspended.	I

9. Forwarded for further necessary action, please.



(Col Abbas Ali Bangash)

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BEFORE THE HONORABLE KPK SERVICE TRIBUNAL, PESHAWAR

Miscellaneous Application dated 12 March 2024

In  
Service Appeal No – 224/2024 instituted by Maisam Ali (~~connected to Service Appeal No-  
1279/2017~~)

Abbas Ali Bangash s/o Capt Ali Muhammad Bangash (deceased) – Usterzai Payan,  
Kohat--- **Petitioner-In-Person**

VS

Ex Constable Maisam Ali s/o Riaz Ali (Usterzai Payan, Kohat)----- Respondent No-1  
Inspector General of Police KPK (CPO Peshawar) ----- Respondent No-2  
DPO Kohat (DPO Office, Kohat)----- Respondent No-3

AFFIDAVIT OF FACTS

1. I, Abbas Ali Bangash s/o Capt Ali Muhammad Bangash (deceased) having residential address of Usterzai Payan, Kohat, as Petitioner - In - Person do hereby solemnly affirm and declare as under :-

- That the facts contained in the accompanying Misc Application are correct & true to the best of my knowledge & information.
- That, above stated facts have been obtained from the record.

Sworn at Peshawar on this 12 day of March 2024



*Shafiqur Rehman Sharaf*  
12-03-24

DEPONENT

Petitioner-in-Person

*Abbas Ali Bangash*  
(Abbas Ali Bangash)  
0300-5708179