

12.02.2015

None is available for appellant though Mr. Amjad Ali, Advocate Mardan has noted the date fixed in the appeal. Let it be relisted for preliminary hearing for 9.3.2015 before S.B.


Chairman

09.03.2015

Counsel for the appellant present. Learned counsel for the appellant informed the Court that the impugned order was modified by the appellate authority regarding which the appellant has preferred another Service Appeal. He further argued that the appellant intends to withdraw the instant appeal which has become infructuous. Dismissed as withdrawn. File be consigned to the record.

ANNOUNCED
09.03.2015


Chairman

09-03-15

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. _____ 1421/2014 _____

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	23.12.2014	<p>The appeal of Mr. Luqman Khan presented today by Mr. Amjid Ali Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR</p> <p style="text-align: center;">This case is entrusted to Bench for preliminary</p>
2	21.1.2015	<p>File received from the Hon'ble Bench</p> <p>None is available on behalf of the appellant. Notice be issued to appellant and his counsel Case to come up for preliminary hearing on 12.2.2015.</p> <p style="text-align: right;"><i>[Signature]</i> MEMBER</p> <p><i>Sis</i> <i>12/2/2015</i> <i>Amjad Ali</i> <i>Advocate</i> <i>Member</i> <i>[Signature]</i></p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 1421 /2014

Luqman Khan

Sub-Inspector, Police Lines, Mardan. Appellant

Versus

Govt. of Khyber Pakhtunkhwa & others. Respondents

I N D E X

S.No	DESCRIPTION OF DOCUMENTS	ANNEX	PAGES
1.	Service Appeal with Affidavit		1-7
2.	Copy of show cause notice	"A"	8
3.	Copy of reply	"B"	9
4.	Copy of order dated 03.09.2014	"B/1"	10
5.	Copy of departmental appeal	"B/2"	11-13
6.	Copy of letter dated 07.07.2014	"C"	14
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Luqman

Appellant

Through

AMJAD ALI

Advocate Supreme Court

Dated: 22.12.2014

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 1421 /2014

P.W.P. Peshawar
1461
23/12/2014

Luqman Khan

Sub-Inspector, Police Lines, Mardan. Appellant

Versus

1. Govt. of Khyber Pakhtunkhwa through Secretary Home, Civil Secretariat, Peshawar.
2. Inspector General of Police/ Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
3. Deputy Inspector General of Police, Mardan.

.....Respondents

**APPEAL U/S 4 OF SERVICE TRIBUNAL
ACT, 1974 AGAINST ORDER OF
RESPONDENT NO.3 DATED 03.09.2014,
WHEREIN APPELLANT IS REVERTED
AND DEPARTMENTAL APPEAL DATED
12.09.2014 BEFORE RESPONDENT NO.2
REMAINED UN-RESPONDED EVEN
AFTER LAPSE OF 90 DAYS WHICH IS
ILLEGAL, AGAINST LAW AND FACTS.**

P.W.P. Peshawar
1461

23/12/14

PRAYER: On acceptance of this appeal, order dated 03.09.2014 may please be set aside and appellant may please be restored to his original/ earlier post of Inspector.

Any other relief deemed fit may also be graciously granted.

Respectfully Sheweth:

Appellant humbly submits as under:

1. That appellant was served with a show cause notice dated 11.07.2014. (Copy of show cause notice is annex "A").
2. That appellant properly replied the same. (Copy of reply to the show cause notice is annex "B").
3. That appellant is reverted from the post of Inspector to Sub-Inspector vide order dated 03.09.2014 by respondent No.3 which is illegal, against law and facts. (Copy of order is annex "B/1").
4. That appellant filed departmental appeal dated 12.09.2014, but in vain (annex "B/2"), hence the instant appeal on following grounds;

GRUNDS:

- A. Because the basis of impugned order is letter dated 07.07.2014 wherein transfer of appellant is requested and not anything beyond the sphere of transfer thus the impugned order is illegal and beyond the parameters of request for transfer. (Copy of letter dated 07.07.2014 is annex "C").
- B. Because appellant has served the Computer Lab since 01.01.2013 until 10.07.2014, he remained a professional Police Officer whilst performing his official duties.
- C. Because appellant was designated as focal person for DATA Mardan Region.
- D. Because appellant has to his credit a book composed by him on Mobile forensic Analysis on the basis of which, he has delivered lectures at Hangu Police Training Centre, CPO Peshawar and Police Lines Mardan. This is of much weight to prove his extraordinary services appellant provided to Police Department, which takes him further in order to contribute and introduce the new technology with the new zeal and spirit.

- E. Because appellant besides taking been interest in his official duties and provided services in off duty hours, which is a positive sign and good gesture, had the authority would have examine the staff in the concerned Lab/ Investigation, the work/ performance of appellant is appreciable than appreciation/ impugned punishment.
- F. Because regarding not taking interest, it is respectfully submitted that the progress report, including extortion cases registered in Mardan Region is a classical example of best performance. (Copy of progress report is annex "D").
- G. Because appellant put his subordinates in immense official work pressure to achieve more than 100% result and achieved the same target.
- H. Because impugned order is due to lack of collective investigative process, wherein neither the inquiry process, wherein neither the inquiry procedure was carried out nor the order of dispensation of inquiry was passed which is in sheer contravention of rules.
- I. Because neither Khyber Pakhtunkhwa Police Rules 1975 were followed in letter and spirit nor the Khyber Pakhtunkhwa E&D Rules 2011.

- J. Because in presence of special rules like Khyber Pakhtunkhwa E&D Rules 2011 procedure under police rules of 1975 is unwarranted and illegal.
- K. Because appellant has not been provided a fair opportunity of explaining his position and his defence has been jeopardized.
- L. Because any request made by OIs/ CIOs/ SDPOs, in writing or verbally, that request was investigated in due time and the final result was obtained within due process and the concerned officers were informed accordingly, furthermore, it could easily be verified from the Computer Lab Mardan, the date and time of the information stated at the back of their application/ request, the Lab is in the possession of the same.
- M. Because not even a single case would be shown which appellant did not submit its report and information/ result in particular/ specified time, thus in absence of the same holding appellant guilty and inflicting major penalty is against all norms of justice.
- N. Because the allegation of private work is also evasive and there is neither any specific allegation nor proof as to what sort of private work appellant is

performing when most of his time plus overtime is spent in investigation/ analysis.

- O. Because appellant is innocent and falsely charged.
- P. Because there is not even a single instance which could be shown to identify any slackness inefficiency, weakness or negligence on the part of appellant.
- Q. Because when the very transfer proposal letter, show cause notice, its reply and progress report are kept in juxtaposition, the progress report merits appreciation as compared to the simple transfer proposal which is stretched upto imposition of major penalty, lowering appellant in the eyes of his colleagues and subordinates and gave a negative message to the others that for best performance in respondent Department results in demotion than promotion/ appreciation.

It is, therefore, most humbly prayed that on acceptance of this appeal, order dated 03.09.2014 may please be set aside and appellant may please be restored to his original/ earlier post of Inspector.

Any other relief deemed fit may also be graciously granted.

Luqman

Appellant

Through

AMJAD ALI

AMJAD ALI

Advocate Supreme Court

Dated: 22.12.2014

AFFIDAVIT

I, Luqman Khan Sub-Inspector, Police Lines, Mardan, do hereby solemnly affirm and declare on oath that the contents of the instant **Appeal** are true and correct.

Luqman

DEPONENT



(8)

Amir A

ASD
Mardan

No. 2008/PA

Dt: 11-7-201

SHOW CAUSE NOTICE
(Under Rules 5 (3) KPK Police Rules, 1975)

1. That you Inspector Luqman while posted as In-charge Computer Lab (Investigation Wing Mardan) rendered yourself liable to be proceeded under Rules 5 (3) of the Khyber Pakhtunkhwa Police Rules 1975 for the following misconduct :-
 - i) You while posted as In-charge Computer Lab (Investigation Wing Mardan) neither take interest in the official duties nor cooperate/coordinate with OIIs/CIOs/SDPOs.
 - ii) You are in the habit of absenting yourself without taking any leave or permission of the competent authority.
 - iii) You are reportedly in-efficient and in-disciplined Police Officer because you did not obey the lawful order of the senior but give preference to private matters despite the official job.
2. That by reason of above, as sufficient material is placed before the undersigned, therefore, it is decided to proceed against you in general Police proceeding without aid of enquiry officer;
3. That the misconduct on your part is prejudicial to good order of discipline in the Police force.
4. That your retention in the Police force will amount to encourage in-efficient and unbecoming of good Police officer;
5. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the rules.
6. You are, therefore, called upon to Show Cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 for the misconduct referred to above.
7. You should submit reply to this show Cause notice within 07 days of the receipt of the notice failing which an ex-parte action shall be taken against you.
8. You are further directed to inform the undersigned that you wish to be heard in person or not?

Reviewed
14.7.2014

(MUHAMMAD SAEED)PSP
Deputy Inspector General of Police,
Mardan Region-I, Mardan

11

مسئلہ کا نمبر 9

جناب عالی

بجوالہ شوکاژ نوٹس نمبر PA/2008 مورخہ 11-07-2014 مشمولہ معروض خدمت ہوں کہ من سائل

مورخہ 01-01-2013 تا 10-07-2014 بحیثیت انچارج کمپیوٹر لیب مردان تعینات تھا

اس دوران میں نے کارسرکار میں نہایت ایمانداری سے دلچسپی لیتے فریض منصبی دیانتداری سے انجام دیے

ہیں۔ اور جملہ OII/COS/SDPOs صاحبان کے ساتھ قریبی رابطہ رکھ کر ان کو مطلوبہ معلومات

بروقت فراہم کیے ہیں بلکہ انکی کماحقہ رہنمائی بھی کی ہے جسکی وجہ سے کافی مقدمات کامیاب ہوئے ہیں۔ اور ستم رسیدہ افراد کی دلجوئی ہوئی ہے۔

از تاریخ تعیناتی تا تاریخ تبادلہ من سائل انچارج کمپیوٹر لیب مردان کبھی اپنی ڈیوٹی سے غیر حاضر نہیں رہا ہوں البتہ افسران بالا کے حکم پر فریض کی بجا آوری کیلئے کہیں بھی جانے سے کوئی عذر نہیں کیا ہے۔

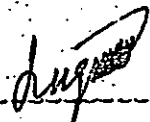
اور بروقت افسران بالا کے احکامات کی تعمیل کرتے ہوئے فریض منصبی انجام دی ہے۔ بطور ثبوت مٹی پر فریض منصبی پروگریس رپورٹس (PROGRESS REPORTS) مشمولہ لف کیے جاتے ہیں۔

اور ذاتی مفاد کو کبھی بھی کارسرکار پر ترجیح نہیں دی ہے اور فریض منصبی کو ہمیشہ مقدم سمجھا ہے اور سمجھتا رہوں گا

۔ اور افسران بالا کے جائز احکامات کی بروقت تعمیل کی ہے اور کبھی بھی ذاتی یا پرائیویٹ کام کو ترجیح نہیں دی ہے اور

نہ ایسا سوچ سکتا ہوں اور نہ ہی ذاتی مفاد کو افسران بالا حکمانہ اور ذاتی عزت پر ترجیح دی ہے تاہم آئندہ مزید محتاط رہوں گا۔

وضاحتی بیان گزارش ہے شوکاژ ہذا کا عدم قرار دیا جا کر داخل دفتر فرمایا جائے۔



امان خان انسپکٹر پولیس لائن مردان

18/7/14

No. 2048/PA
Dt. 23-7-2014
SP/OP & Mdn.

For enquiry and
report
Date

(7)

مذا
18/7/14


ORDER.

This order will dispose-off a Show Cause Notice under Police Rules 1975, served upon Offg: Inspector Luqman Khan the then In-charge Computer Lab, Investigation, Mardan (now under suspension) vide No. 2008/PA dated 11.07.2014, on account of non inefficiency/cooperation with his staff.

Brief facts of the case are that he while posted as In-charge Computer Lab Investigation Wing, Mardan has allegedly neither taking interest in his official duty nor cooperate/coordinate with OIIs/CIOs/SDPOs. Further more he is inefficient, in-disciplined & is in the habit of absenting himself without taking any leave or permission of the competent authority. Reply of the Show Cause Notice was received & perused found not convincing.

I have perused the record and also heard the appellant in person in Orderly room held in this office on 03.09.2014, but he failed to produce any plausible reason about his innocence. In view the above serious allegations, I MUHAMMAD SAEED, Deputy Inspector General of Police, Mardan Region-I, Mardan, the Officer was found guilty of misconduct as the charges have been proved against him with out any shadow of doubts. Therefore he is hereby reinstated in service from the date of suspension & reverted to his substantive rank of Sub Inspector with immediate effect.

ORDER ANNOUNCED.

7/2

(MUHAMMAD SAEED)RSP
Deputy Inspector General of Police,
Mardan Region-I, Mardan.

No. 5904-07 /ES, Dated Mardan the 03/09 /2014.

Copy forwarded for favour of information & necessary action to the:-

1. Provincial Police Officer, Khyber Pukhtunkhwa, Peshawar please.
2. District Police Officer, Mardan.
3. Superintendent of Police Investigation, Mardan
4. PA Region Office, Mardan.

(*****)

TO

The Inspector General of Police
Khyber Pakhtoonkhwa
Peshawar

Subject: **APPEAL AGAINST THE ORDER OF REVERSION BY THE WORTHY DIG MARDAN**
VIDE OB NO. 5904-07/ES DATED MARDAN THE 03/09/2014

With regards to the above, I was served a Show Cause Notice, the copy of which is attached herewith (as annexure- A) and the summary of the same is that :

1. That I have not fulfilled my duties and that I have been absent from my official duties
2. That I have not cooperated with my superiors (OIs/CIOs/SDPOs)
3. That I gave preference to private work over my official duties

The situation at first unfolded in a letter was sent to the worthy Deputy Inspector General of Police Mardan Region on 07/07/2014 the Subject of which was Transfer/Posting. The letter is self-explanatory and the copy of which is attached herewith (as annexure- B)

I was then served a Show Cause Notice by the said esteemed office and the response was accordingly submitted, which further resulted into an Order issued against me. The Order of Reversion.

I would intend to provide the information in a chronological order to prove my innocence:

The response was submitted to the Show Cause Notice to the esteemed office of Mardan Regional Police Office, which was found unsatisfactory by the said office (the Order is attached herewith as a ready reference annexure- C)

My submission is, in order to respond to the Allegations, my earlier response and the Order.

- i. I have served the Computer Lab since 01/01/2013 until 10/07/2014, I remained a professional Police Officer whilst performing my official duties,
- ii. In addition to the above I was designated as focal person for DATA Mardan Region
- iii. I have to my credit a book composed by me on Mobile forensic Analysis on the basis of which, I have delivered lectures at Hangu Police Training Centre, CPO Peshawar and Police Lines Mardan. This is of much weight to prove my extra ordinary services I have provided to my Police Department, which takes me further in order to contribute and introduce the new technology with the new zeal and spirit

TO

The Inspector General of Police
Khyber Pakhtoonkhwa
Peshawar

Subject: VIDE OB NO. 2904-07/ES DATED MARDAN THE 03/09/2014
APPEAL AGAINST THE ORDER OF REVERSION BY THE WORTHY DIG MARDAN

With regards to the above, I was served a Show Cause Notice, the copy of which is attached herewith (as annexure-A) and the summary of the same is that

1. That I have not fulfilled my duties and that I have been absent from my official duties
2. That I have not cooperated with my superiors (OIS/CIO/SDPOs)
3. That I gave preference to private work over my official duties

The situation as first intimated in a letter was sent to the worthy Deputy Inspector General of Police Mardan Region on 07/07/2014 the subject of which was Transfer/Posting. The letter is self-explanatory and the copy of which is attached herewith (as annexure-B)

I was then served a Show Cause Notice by the said esteemed officer and the response was accordingly submitted, which further resulted into an Order issued against me. The Order of reversion

I would intend to provide the information in a chronological order to prove my innocence:

The response was submitted to the Show Cause Notice to the esteemed officer of Mardan Region Police Officer, which was found unsatisfactory by the said officer the Order is attached herewith as a ready reference annexure-C)

My submission is, in order to respond to the allegations, my earlier response and the Order:

I have served the Computer Lab since 01/01/2013 until 10/07/2014, I remain and a professional Police Officer whilst performing my official duties.

In addition to the above I was designated as focal person for DATA Mardan Region.

I have to my credit a book composed by me on Mobile for Basic Analysis on the basis of which, I have delivered lectures at Har Gu Police Training Centre, CPD Peshawar and Police Lines Mardan. This is of much weight to prove my extra ordinary services I have provided to my Police Department, which takes me further in order to continue and introduce the new technology with the new zeal and spirit.

(19)

- iv. I have had the opportunity to take my utmost interest in providing my official duties to the Department I am working for and it is worth mentioning that I provided my services off duty hours, It would have been good gesture if the Concerned Authority had little effort made in order to engage my staff to clarify and simplify the position as their witnesses could have played a major role.
- v. Not taking interest in my official duties. I would leave this to your good self to make a judgment on the basis of my progress reports including extortion cases registered in Mardan Region, which is self-explanatory (Attached herewith as annexure-D).
- vi. In order to perform my duties, I put my subordinates under immense official work pressure to give our 100 percent to our Department.
- vii. Unfortunately the decision was made in the absence of collective investigative process
- viii. A fair chance of proving myself not guilty was not given, regrettably stating.
- ix. Any request made by OIIs/ CIOs/ SDPOs, in writing or verbally, that request was investigated in due time and the final result was obtained within due process and the concerned officers were informed accordingly, furthermore it could easily be verified from the Computer Lab Mardan, the date and time of the information stated at the back of their application/request, the Lab is in the possession of the same.
- x. I can assure you that not even a single case could be brought against me in which I have not fulfilled my duties and which was left unfinished.
- xi. There have been rare timing in which I was not in the office but the concerned superior was informed in advance, in addition most of it was because of my investigation in matter bestowed upon me but not due to my private life
- xii. The earlier letter to Mardan Police Regional officer or the Show Cause Notice, didn't clarify the term (*Pays attention to the private works in spite of official job*) *I have no comment as the statement itself is silent to simplify and clarify it further, that what does the the private work mean?*

Just for the sake of argument if there is or was any case pending or unfulfilled then why didn't it mention in the show Cause Notice and the Order made subsequently? I am absolutely sure that there is none to prove me guilty.

The earlier request of my transfer and further, Show Cause Notice was of a fishing expedition nature carrying no solid evidence against me to prove me otherwise.

13

I was forcing myself not to counter attack my superior's Show Cause/ Order but if it is at the expense of my official integrity then I had to bring into your kind notice the above mentioned facts, but having said I am abiding myself to be dutiful subordinate of my Superiors.

Prayer,

Sir, the allegations are of a general nature and not specific as per the face value of its plain reading. Keeping in view the above mentioned facts, I humbly request to provide me an opportunity to serve my Department as per my previous position as Inspector and kindly set aside the Order of worthy DIG Mardan NO. No. 5904-07/ES Dated Mardan the 03/09/2014, wherein the Appellant was awarded a major penalty of Reversion

I can assure you that I will be efficiently performing my official Duties to the best of my ability under your Command.



Yours Sincerely

Luqman Khan (Sub Inspector)

12.09.2014

Police Lines Mardan

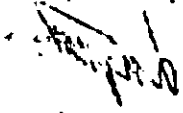
(13)

I was forcing myself not to counter attack my superior's Show Cause Order but it is at the expense of my official integrity then I had to bring into your kind notice the above mentioned facts, but having said I am abiding myself to be dutiful subordinate of my superior.

Prayer.

Sir, the allegations are of a general nature and not specific as per the face value of its plain reading. Keeping in view the above mentioned facts, I humbly request to provide me an opportunity to serve my Department as per my previous position as Inspector and kindly set aside the Order of worthy DIG Mardan NO. No. 2904-07/E2 Dated Mardan the 03/09/2014 wherein the Appellant was awarded a major penalty of Reversion.

I can assure you that I will be efficiently performing my official Duties to the best of my ability under your Command.



Yours Sincerely

Ludman Khan (Sub Inspector)

Police Lines Mardan

14/14

The Head of Investigation Wing,
Mardan.

The Deputy Inspector General of police
Mardan Region-1, Mardan

(14)

No. 3553 /E. dated Mardan, the. 07-7/2014.

for C
@ 28
seen

Subject: TRANSFER / POSTING.

Memo:

It is submitted for your kind information that Inspector Luqman Incharge Computer Lab (Investigation Wing Mardan) is not taking interest in the official duties and whenever OIs / COs and SDPOs calls him, either he not available or not cooperates/coordinates within due time. He was checked time and again and found him absent without taking any leave or permission.

He is an inefficient and indiscipline police officer and not obeys the order of his superiors. Moreover pays his attention to the private works in spite of his official job.

His services are no more required and keeping in view he may kindly be transferred from Investigation Wing Mardan.

No. / /E.

~~Head of investigation
Mardan~~

Copy to District Police officer Mardan for information.

Call Luqman in OR on
8/07/14
ad 1
7/07.

Head of investigation
Mardan

Handwritten signature: *Handwritten signature*

PROGRESS REPORT FORENSIC EXAM-MOBILE DATA

DISTRICT MARDAN

Dec-13

51

S/NO	Police Station	FIR NO.US/ date	Name of Accused	Accused cell No.	Number of contacts in Mobile Phone Recoverd	Number of persons interviewed from phone book.	Any useful connection unearthed	CDR obtained or not.
1		FIR# 566 dt 9.12.13 us 302 PS SBG.	1-ARSHAD S/O GHANI-URREHMAN R/O BALA GARHI	3439209761	1.263 contacts	5	Accused connected to each other.6 accused are arrested.	yes
			2-FAZAL AMIN S/O GULZAMAN R/O R/O ATTA MUHAMMAD BANDA		2.200 contacts			
			3- FAYZULLAH S/O USMAN GHANI R/O ATTA MUHAMMAD BANDA.4jawad s/o islam nabi.5 maqbool s/o shamas khan6 abdul qavi s/o abdul baqi.		3.347 contacts			
2	CITY	Fir#1294 dt.17.12.13 us 365 PS City.	UNKNOWN	3119647381			In process	YES
3	CHOORA	FIR#787 dt.29.12.13 us 457/380 PS Choorā.	GHULAM HUSSAIN S/O MUSA KHAN R/O CHARSADEA	3333336693	nil	nil	Accused at large	YES
				3479365863				
				3465500009				
				3421891550				
				3459343365				
4	RUSTAM	FIR #965 date 27/12/13 us 419/420 ps rustam.	Jalat khan s/o muhammad saeed.r/o katta khat.	3459465279	251	3	Accused arrested	yes
5	KHARKI	FIR 421 DATED 20/12/13 U/S 302 PPC PS KHARKI	Zahir Ali s/o Anwar Shah r/o Mohallah Baghban Qasami	3357616423	All contacts have been explored in terms of cdr	All contacts have been explored in terms of cdr	Accused arrested	yes
				3146931439			Recovery.1,80,000	
6	SADDAR	FIR#748 DATE 29/12/13 US 365A/7ATA PS SADDAR	SHERBAHADAR S/O GULAJAN	3439991398	290	All contacts have been explored in terms of cdr	Kidnappe recovered. accused arrested.mukhtar s/o younas r/o tangi	YES
			2-SADDAM S/O SHERBAHADA	3479450005				
			3-SHOAIB S/O BASHEER R/O HAREE CHAND	3469269838				
			4-MUKHTYAR S/O YOUNAS R/O PRANG CHARSADEA					

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Police department

District Mardan

PROGRESS REPORT FORENSIC EXAM-MOBILE DATA - JANUARY 2014

S/O	DISSTRIC.	TOTAL CASES.	TOTAL ACCUSED.	TOTAL CELL NO.	TOTAL CONTACTS IN MOBILE PHONES RECOVERED.	TOTAL NUMBER OF PERSONS INTERVIEWED FROM PHONE BOOKS.	TOTAL USEFUL CONNECTIONS UNEARTHED	TOTAL NUMBER OF CDR OBTAINED.
01	Mardan	14	09	31	251	07	02	31

Police department

District Mardan

PROGRESS REPORT FORENSIC EXAM-MOBILE DATA – February- 2014

S/O	DISSTRICIT.	TOTAL CASES.	TOTAL ACCUSED.	TOTAL CELL NO.	TOTAL CONTACTS IN MOBILE PHONES RECOVERED.	TOTAL NUMBER OF PERSONS INTERVIEWED FROM PHONE BOOKS.	TOTAL USEFUL CONNECTIONS UNEARTHED	TOTAL NUMBER OF CDR OBTAINED.
01	Mardan	08	06	16	195	05	04	16

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PROGRESS REPORT FORENSIC EXAM-MOBILE DATA MARCH AND APRIL

DISTRICT MARDAN			MARCH/APRIL 2014					
S/N O	Police Station	FIR/DD NO,	Name of Accused	Accused cell No.	Number of contacts in Mobile Phone Recoverd	Number of persons interviewed from phone book.	Any useful connection unearthed	CDR obtained or not.
1	CITY	Fir# 271 dt 12.3.14 us 457/380 PS CITY.	1-ASIF 2-SAYED MUNEER SHAH 3- DILAWAR 4- ZALAMY 5- WAHAB 6-FARIDOOON 7-ZALMAY 8-ZAFAR 9- SHAM SHAD 10- FRIEND OF SHAM SHAD AFGHAN NATIONAL	03075742320-03331587427-3116668738	TOTAL CONTACTS 45 AND SIX MOBILE RECOVERD	NIL	71 TOLA GOLD RECOVERD AND THREE ACCUSED KILLED IN ENCOUNTER	yes
2	PARHOTI	Fir# 118 dt 16.3.14 us 25D/506 PS PARHOTI.	ABDU-ALLAH S/O ABDURAUUF R/O PARHOTI	0331-9098237	1---175	NIL	Accused arrested	YES
3	HOTI	Fir# 181 dt 30.3.14 us 302/324 PS HOTI.	.1- NISAR S/O SHAMSUDIN R/O DANG BABA HOTI	0304-9167137	1---250	nil	Accused arrested	YES
4	TBI	FIR #226 date 31/3/14 us 395/342 ps TBI.	1FAZAL GHAN 2- USMAN GHANI 3- IHSAN GHANI S/O FAZAL GHANI R/O PESHAWAR	3355065990	NIL	NIL	MOBILE PHONE RECOVERD (accused arressted)	yes
5	SADDAR	FIR#167 DATED 11/4/14 U/S 17 HARABA PS SADDAR	1-KALIMUALLAH CHARSADA 2-SHAZAIB S/O NASEEB KHAN CHARSADA 3-KALEEM GUL 4- MASAAOD 5- IRSHAAD KOHAAT	351801060624350	NIL	NIL	TWO MOBILES AND MOTERCYCLE RECOVERD (accused arressted)	yes
6	SADDAR	FIR#186DATE 23/4/14 US 382 PS SADDAR	1-LIAQAT 2- SYED UMAR 3-TOUSEEF 4- ZIAUALLAH S/O AMEER RAHMAN PARHOTI MARDAN	35851805689641	NIL	NIL	ONE MOBILE AND MOTERCYCLE RECOVERD (Accused arressted)	YES
7	HOTI	FIR#193DATE 5/4/14 US 9CCNSA PS HOTI	M-AZAM S/O DILWAR PESHAWAR	3005851482-	NIL	NIL	ACCUSED HAD EXCHANGED CALLS	YES
8	RUSTAM	FIR#144 DATE 30/4/14 US 302 PS RUSTAM	JIHAD -ABDULWAKEEL S/O PEER DAD R/O RUSTAM	3456542134	NIL	NIL	1 KALASHANIKOV AND A PISTOL Accused Arressted	YES
9	TBI	FIR#492 DATE 18/10/09 US 302 PS TBI	NISAR-IBRAR S/O SHERZAMAN R/O UMARZAI	3425967781	NIL	NIL	1-PISTOL / Accused Arressted	YES
10	TBI	FIR#257 DATE 25/09/10 US 447/427 PS TBI	NISAR-IBRAR S/O SHERZAMAN R/O UMARZAI	3439577866	NIL	NIL	1 KALASHANIKOV Accused Arressted	YES
11	TBI	FIR#382 DATE 9/05/13 US 5EXP PS TBI	NISAR-IBRAR S/O SHERZAMAN R/O UMARZAI	AS ABOVE	NIL	NIL	AS ABOVE	YES
12	CITY	FIR# 383 DT 15/4/14 US 302 PS CITY	ISRAR S/O YAR MUHAMMAD R/O TAKH BHAI	3459340432	NIL	NIL	Accused	YES
13	SHERGARH	FIR 109 DT. 22/3/14 U/S 457/380 PS SHERGARH	ANWAR S/O FAREED R/O SBG. 2. ASHRAF S/O ZULFIQAR R/O ISMAILA	3446014480	1---110 & 2---140	NIL	THE GANG MEMBERS DISCLOSED	YES
14	SHERGARH	FIR#68 DT 23/2/14 3/4EXP 7ATA SHERGARH	QARI AZIZ URREHMAN R/O BAJUR	3030214129	1---80	NIL	Accused	YES
15	HOTI	DD# 7 DT 11/3/14 US 156(3) HOTI	NAILA MISSING	3045661791	NIL	NIL	DEAD BODY RECOVERD	YES
16	SHERGARH	DD# 22 DT 11/3/14 US 156(3) S.G CONVERTED TO FIR 190 DT. 01/05/14 U/S 365 BIRS S.G	ARSHAD 2. ASAD S/O TAJDAR R/O SKHAKOT	3118168066 & 3128539886	NIL	NIL	MISSING GIRL RECOVERED	yes
17	SADDAR	DD# 35 DT, 21/3/14 PS SADDAR	HAIDER S/O ZARDULLAH (MISSING PERSON)	3146866628	NIL	NIL	MISSING PERSONG RECOVERED	yes
18	KHARKI	DD# 22DT. 20/04/14 U/S 156 (3)Crpc PS KHARKI	GHALIB MISSING	3419904157	nil	nil	MISSING PERSONG RECOVERED	yes

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PROGRESS REPORTS OF ASIF HUSSAIN 1596 COMPUTER LAB MARDAN

DISTRICT MARDAN								MAY/JUNE 2014	
S/NO	Police Station	FIR/DD NO,	Name of Accused	Accused cell No.	Number of contacts in Mobile Phone Recoverd	Number of persons interviewe d from phone book.	Any useful connection unearthed	CDR obtaine d or not.	
1	SHERGARH	FIR 190 DATED 11/5/14 U/S 365-B PS SHERGARH	ASAD S/O TAJ DAR R/O SKHAKOT CURRENT ADRESS SIALKOT (2) ARSHAD S/O TAJ DAR R/O SKHAKOT CURRENT ADRESS SIALKOT	3018168066	NIL	NIL	ACCUSED ARRESTED	yes	
2	SARO SHAH	FIR 67 DATED 17/5/14 u/s 387/506 PPC PS SARO SHAH	MUZAMIL SHAH S/O SABZ ALI-SHAH R/O KHADI KALAY	3075945295	NIL	NIL	Accused arrested	YES	
3	JABBAR	FIR 188 DATED 27/5/14 U/S 387/506/25T PS JABBAR	ZAHID ULLAH S/O DORAN R/O JALALABAD AFGHANISTAN CURRENT ADRESS CHAKDARA REFUGEE CAMP	3429503323	NIL	NIL	Accused arrested	YES	
4	SADDAR	FIR 177 DATED 17/4/14 U/S 302 PS SADDAR	KILLED BY TERRORIST	3066282576	NIL	NIL	NIL	yes	
5	PAR HOTI	DD 27 DATED 11/5/14 U/S 156(3) PS PAR HOTI	MST GHAZALA R/O SIKANDARAY MARDAN	3038077143 3115457268	NIL	NIL	IN PROGRESS	yes	
6	KHARKI	FIR 70 DATED 27/5/14 U/S 506/25D/109/3 4 PS KHARKI	ALAMGHIR S/O UMRA KHAN R/O KHARKI SARFARAZ S/O SHAHBAZ KHAN R/O KHARKI	3439894513 3449883269	NIL	NIL	Accused arrested	YES	

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7	KATLANG	FIR 253 DATED 7/6/14 U/S 365-A/15PP PS KATLANG	TAJ MUHAMMAD S/O FAQEER MUHAMMAD R/O KHANMAI CHARSAJDA 2.MOEEN S/O FAQEER MUHAMMAD R/O KHANMAI CHARSAJDA	3410207407	NIL	NIL	ACCUSED ARRESTED	YES
8	LUNDKHWAR	FIR 229 DATED 5/6/14 U/S 387/506/25D PS LUNDKHWAR	WAJID S/O SULTAN R/O KAMARGHAI JANDAI	3125868447	NIL	NIL	ACCUSED AT LARGE	YES
9	SADDAR	FIR 251 DATED 12/6/14 U/S 382/34 PS SADDAR	1.IDRESS S/O HAZRAT GUL R/O GHAZNAVI KALONI 2.ISMAIL S/O LAIQUAT R/O MUQAM CHAWAK 3.ARSALAN S/O M.SADDIQ R/O SHARIF ABAD	3059244229	NIL	NIL	1 ACCUSED ARRESTED 2 AT LARGE RAKSHAW G/2300/KARAK RECOVERED	YES
10	PAR HOTI	FIR 288 DATED 26/6/14 U/S 506/387/25D PS PAR HOTI	1.ISMAIL 2. ABDUL RASHID 3.ALI REHMAN S/O GUL REHMAN R/O SIKANDARAY	3038077143	NIL	NIL	Accused Arrested	YES
11	NISATTA	COMPLAINANT SHER ALI U/S 302 PS NISATTA	ACCUSED ARRESTED	MOBILE NUMBERS WORKED OUT	NIL	NIL	Accused Arrested	YES
12	PUNJAB	COMPLAINANT IMTIAZ R/O SARAI ALAMGIR	ACCUSED ARRESTED	MOBILE NUMBERS WORKED OUT	NIL	NIL	STOLEN CAR RECOVERED	YES

بعد الت
سریٹریٹ

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2014 منجانب اسلام آباد
تعمیرات

23/12/2014

مورخہ:

بنام:

مقدمہ:

دعویٰ:

حکومت

تعمیرات

جرم:

سریٹریٹ

مقدمہ مندرجہ عنوان بالا اپنی طرف سے واسطے پیری دی جواب دہی دکل کاروائی متعلقہ

ان مقام کے لئے امجد علی ایڈووکیٹ سپریم کورٹ آف پاکستان اسلام آباد

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء وصولی چیک در پیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زاریں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیری یا ڈگری کی طرف یا اپیل کی براندگی اور منسوخی نیز دائر کرنے سے اپیل نگرانی و نظر ثانی و پیری کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختیار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور و قبول ہوگا دوران مقدمہ میں جو فرچہ و جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ پر ہوا یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیری مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سنڈر ہے۔

2014

دستبر

تاریخ

23

المرقوم:

العبد

گواہ

العبد

بمقام

Attested and Accepted
Amjad Ali
Advocate
Marolium
0321-9870175

تعمیرات

Before the chairman service trial
petition

SA 142/2014

Lugman Khan vs Govt.

Application for withdrawal of appeal
with permission to file/pursue
fresh one as appellate authority
converted the punishment of
reversion into forfeiture of
service.

in

1. That forwared case is fixed
for today.

2. That appellant request for
withdrawal as per reason
mentioned in the heading
of application

It is therefore humbly
requested that appeal may
please be withdrawn with
permission to file fresh one.

Lugman Khan

(Signature)

9/3/15 Adv. Sup.