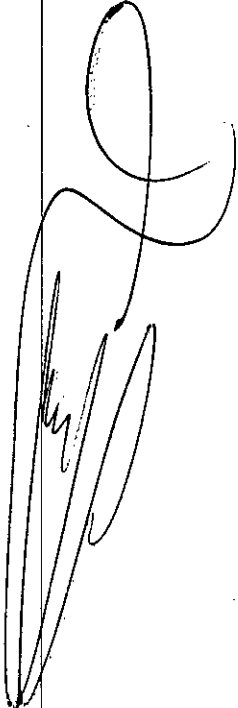


Sr. No.	Date of order/ proceedings	Order or other proceedings with signature of Judge/ Magistrate
1	2	3
1.	11.12.2015	<p style="text-align: center;">KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.</p> <p style="text-align: center;">Appeal No. 1396/2014</p> <p style="text-align: center;">Shah Rasool Versus Provincial Police Officer, Govt. of KPK, Peshawar etc.</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>PIR BAKHSH SHAH, MEMBER.-</u> Appellant with counsel (Mr. Rizwanullah, Advocate) and Government Pleader (Mr. Muhammad Jan) with Muhammad Gahni, S.I for the respondents present.</p> <p>2. Appellant, as Sub Inspector was dismissed from service vide impugned order dated 27.08.2014. His departmental appeal was not responded within the statutory period, hence this appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.</p> <p>3. Per memo. of the appeal, appellant joined service in the police department as Constable in the year, 1984 and rose up to the rank of Sub Inspector. At the relevant time, he was SHO of P.S Choorā, district, Mardan. There were two rival groups, known as Kabeer Group and Qaisar Group. P.O Zahid wanted in a murder case was a friend of the Qaisar Group. He was raided upon by the appellant. Though Zahid was not found but five others including the said Qaisar were found with unlicensed weapons who were arrested and the case was</p>



registered against them. On 02.08.2014, the appellant also received information from Qaisar Group that P.O Khushdil of the Kabeer Group wanted in a murder case is present in his house on which he raided and arrested him alongwith Riffle M-16 with 84 rounds and pistol 30 bore with 28 rounds. On this raid, the Qaisar Group was very happy who in order to express their happiness, made aerial firing. S.I Dilawar Khan arrested accused of the aerial firing and against them FIR was registered. Since this party of the aerial firing belonged to Qaisar Group therefore, his father Wali Dad submitted a written complaint against the appellant and S.I Daud Khan, alleging that these Police officers had sympathy with and had intimate relations with Kabeer Group. The task of this preliminary enquiry on this complaint against the appellant was assigned to S.P (Investigation), who submitted his report dated 18.4.2014. According to this enquiry report, the appellant was reported to be in league with the relative of P.Os, hence a show cause notice was issued to the appellant. Consequently, the appellant was dismissed from service.

4. Arguments heard and record perused.

5. It is evident that major penalty of dismissal from service has been imposed on the appellant but prior to that no charge sheet and regular enquiry was conducted. We have carefully perused report of the preliminary enquiry and have come to the conclusion that no opportunity of cross

examination has been given to the appellant on the witnesses. The enquiry officer in view of the cell phone contacts of the appellant with father of one of the P.O has concluded that the appellant was in league with relative of the P.O. The opinion of the Tribunal would be that the same may hardly count as misconduct of an SHO for lack of solid and material evidence that he had violated any law through these contacts and that the SHO had mis-used his authority for this league-ship, if any. The penalty, in the circumstances, undoubtedly is too harsh. Evidently, no opportunity of proper defence has been provided to the appellant. The proper enquiry was also needed as accused involved in aerial firing were arrested by Daud Khan who was left free and appellant harshly penalized. For the said reasons, the impugned orders cannot be maintained, the same are set aside and the case is remitted to the respondent-department to conduct denovo proceedings. Needless to mention that the appellant is reinstated into service for the purpose of denovo proceedings. Question of back benefits will be subject to the outcome of denovo proceedings. The appeal is disposed off accordingly. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
11.12.2015.


(ABDUL LATIF)
MEMBER


(PIR BAKHSH SHAH)
MEMBER

02.11.2015

Counsel for the appellant and Mr. Muhammad Ghani, SI (Legal) alongwith Mr. Usman Ghani, Sr. GP for respondents present. To come up for order 26-11-15.


MEMBER


MEMBER

26.11.2015

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Order could not be announced due to learned Member (Executive) is on leave. To come up for order on

11/12/16


Member

17.3.2015

Appellant in person and Addl. AG with Muhammad Ghani, SI for the respondents present and reply filed. To come up for rejoinder and arguments on 10.8.2015.


MEMBER

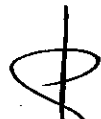
10.08.2015

Counsel for the appellant and Muhammad Ghani, S.I(Legal) alongwith Muhammad Jan, GP for the respondents present. During the course of arguments its transpired that no preliminary enquiry report has been annexed. Representative of the respondents is directed to produce complete record as well as preliminary enquiry report. To come up for further arguments on

01-10-2015



Member



Member

01.10.2015

Counsel for the appellant and Mr. Muhammad Ghani, SI (Legal) alongwith Mr. Muhammad Jan, GP for respondents present. Record about the enquiry conducted by S.P Investigation received copy of which is placed on file. Arguments heard. To come up for order on 2-11-15



Member


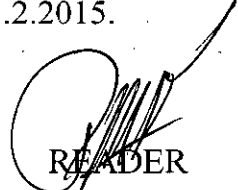



Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1396/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate.
1	2	3
1	11.12.2014	<p>The appeal of Mr. Shah Rasool presented today by Mr. Rizwanullah Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is sent to the Bench for preliminary hearing to be put up for order.</p>
2	21.1.2015	<p>Since 20th January, 2015 has been declared as public holiday by the provincial government, therefore, case to come up for the same on 3.2.2015.</p> <p style="text-align: right;"> READER</p>
3.	3.2.2015	<p>Counsel for the appellant present and submitted that despite rendering serving for more than 31 long years in the department, major penalty of dismissal from service was imposed on the appellant in utter violation of law and rules, without any enquiry being conducted. Reliance was placed on 2009-SCMR-412. Points raised need consideration. The appeal is admitted for regular hearing, subject to all legal exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 17.3.2015.</p> <p style="text-align: right;"> MEMBER</p>

Appellant deposited process fee
 & Security

BEFORE THE HON'BLE CHAIRMAN, KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1396 /2014

1. Shah Rasool, Ex-Sub Inspector R/O Sugar Mills Road, Waheedabad near Total Pump, Bagh-e-Haram, District Mardan.

APPELLANT

VERSUS

1. The Provincial Police Officer, Government of Khyber Pakhtunkhwa & others.

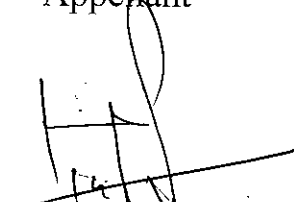
RESPONDENTS

I N D E X

S.No	Particulars	Annexure	Pages #
1	Service Appeal	-	1-9
2	Affidavit	-	10
3	Copies of FIRs	A to C	11-13
4	Copy of daily diary dated 11-7-2014	D	14
5	Copy of Daily Diary dated 2-8-2014	E	15
6	Copy of compliant	F	16-17
7	Copy of show cause notice	G	18
8	Copies of reply, daily diary and application	H & J	19-22
9	Copy of impugned order dated 27-8-2014	K	23
10	Copy of departmental appeal dated 3-9-2014	L	24-27
11	Copies of affidavits and mobile data	M to O	28-32
12	Wakalatnama	-	


Appellant

Through


Rizwanullah
M.A. LL.B

Dated: 11-12-2014

Advocate High Court, Peshawar

**BEFORE THE HON'BLE CHAIRMAN, KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 1396/2014

1439
11-12-2014

Shah Rasool, Ex-Sub Inspector
R/O Sugar Mills Road, Waheedabad near Total Pump,
Bagh-e-Haram, District Mardan.

APPELLANT

VERSUS

1. The Provincial Police Officer, Government of Khyber Pakhtunkhwa, Peshawar.
2. The Deputy Inspector General of Police, Mardan Region-I, Mardan.
3. The District Police Officer, Mardan

RESPONDENTS

**APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974 AGAINST THE
IMPUGNED ORDER NO. 5725-26/ES DATED
27-8-2014 PASSED BY THE DEPUTY
INSPECTOR GENERAL OF POLICE, MARDAN
REGION-I, MARDAN WHEREBY THE
APPELLANT WAS AWARDED MAJOR
PENALTY OF DISMISSAL FROM SERVICE.
THE APPELLANT PREFERRED
DEPARTMENTAL APPEAL WITH THE
RESPONDENT NO.1 ON 3-9-2014 BUT THE
SAME WAS NOT RESPONDED WITHIN THE
STATUTORY PERIOD OF LAW.**

PRAYER IN APPEAL

By accepting this appeal, the impugned order No.5725-26/ES dated 27-8-2014 passed by the Deputy Inspector General of Police, Mardan Region-I, Mardan may very graciously be set aside and the appellant may kindly be reinstated in service with full back wages and benefits.

RESPECTFULLY SHEWETH

Short facts giving rise to the present appeal are as under:-

1. That the appellant joined the service of Police Department as Constable in the year 1984 and then rose up to the post of Sub-Inspector on account of his dedication, devotion and commitment to his job. He had 31 years unblemished service record to his credit.
2. That the following FIRs were lodged against the accused in Police Station Choorā, Mardan:-
 - i. Case FIR No. 310 dated 11-7-2014 U/S 216 PPC/15AA PS Choorā.
 - ii. Case FIR No. 362 dated 2-8-2014 U/S 15AA PS Choorā.
 - iii. Case FIR No. 363 date 2-8-2014 U/S ¼ AF/15AA PS Choorā.

(Copies of FIRs are appended as Annex-A to C).

3. That there were two rival groups in village Chamdheri. One group was known as "Kabeer Party" whereas the other group was called as "Qaisar Party". The aforesaid Qaisar and Kabeer alongwith other accused were involved in different criminal cases.
4. That on 11-7-2014 the appellant received information that proclaimed offender Zahid S/O Shah Jahan R/O Chamdheri, wanted in case FIR No. 166 dated 21-4-2014 U/S 302/34-PPC , PS Choorā (a close friend of Qaisar S/O Wali Dad R/O Chamdheri) was present in the Hujra of Qaisar group. Therefore, the appellant raided the said Hujra for the arrest of above named Proclaimed offender. But he was not found there, however, the following persons who were harbouring and helping the said PO were found in the Hujra. The unlicensed weapons were recovered from their possession, which details are as under:-

- 1) Qaisar S/O Wali dad R/O Chamdheri
(recovered one short gun with 05 cartridges).
- 2) Saeed Bacha S/O Bacha said R/O Chamdheri
(recovered one klashan kov with 22 rounds).
- 3) Shahid S/O Shah Jahan R/O Chamdheri
(recovered one pistol 30 bore with 10 rounds).
- 4) Khan Taj S/O Abdul Qayyum R/O Chamdheri
(recovered Pistol 30 bore with 12 rounds).
- 5) Amraiz S/O Dilawar R/O Chamdheri,
(recovered Pistol 30 bore with 2 rounds).

6) Umer Muhammad S/O Muhammad Rehman R/O Gadar
(recovered pistol 30 bore with 7 rounds).

5. That a proper case vide FIR No. 310 dated 11-7-2014 U/S 16PPC /15AA PS Chooria was registered against the above mentioned accused. They were arrested accordingly and suspected mobile sets were also recovered from the possession of Qaisar, Amraiz and Saeed Bacha accused respectively. These mobile sets were taken into possession and a report thereof was entered in the daily diary vide DD No. 31 dated 11-7-2014 PS Chooria. Thereafter, the accused were sent to judicial lock up by the competent court of jurisdiction **(Copy of Daily Diary is appended as Annex-D).**

6. That on 2-8-2014, the appellant also received information from "Qaisar Group" that his opponent PO Khushdil S/O Waris Khan R/O Chamdheri, wanted in case FIR No. 488 dated 13-7-2013 U/S 302/324-PPC PS Chooria was present in his house. Therefore, the appellant raided the house of said PO alongwith Police Party. The PO Khushdil duly armed with rifle M-16 with 84 rounds and pistol 30 bore with 28 rounds, was found present in his house and was arrested accordingly **(Copy of Daily Diary is Annex-E).**

7. That when the appellant came back to Police Station after conducting the said raid, he received information that the rival group of PO Khushdil i.e "Qaisar Group" had started indiscriminate areal firing to show their gladness on the arrest of the accused. In order to avoid any un-toward incident in the village, the appellant directed the patrolling officer Daud Khan (SI) to visit the concerned area and take necessary action in accordance with law.

8. That in compliance with the said order, Daud Khan (SI) duly visited the said village and then registered a case FIR No. 363 dated 2-8-2014 U/S 3/4 AF / 15AA /188 against the following accused:-

- 1) Kifayat S/O Bawar R/O Chamdheri
- 2) Saeed Bach S/O Bacha Said R/O Chamdheri
- 3) Hamad S/O Amin Khan R/O Chamdheri
- 4) Abdus Salam R/O Rahim Dad R/O Chamdheri
- 5) Tahir Dad S/O Rahim Dad R/O Chamdheri

9. That it is pertinent to mention here that the accused involved in case FIR No. 310 and FIR No. 363 were related to the group of "Qaisar Party". Therefore, the father of Qaisar namely wali Dad S/O Rahim Dad R/O Chamdheri submitted a complaint against the appellant and Daud Khan (SI) before the Deputy Inspector General of

Police, Region-I, Mardan, praying therein that necessary action may be taken against the said officials as they had sympathy with the "Kabeer Group" and therefore, they did not arrest the said accused (Kabeer) during the raid. **(Copy of complaint is appended as Annex-F).**

10. That respondent No. 2, on the basis of said complaint, initiated disciplinary action at the back of appellant and Superintendent of Police (Investigation) Mardan was appointed as inquiry officer to conduct preliminary inquiry into the allegation levelled against him.
11. That the appellant neither associated with the said inquiry nor any witness was examined in his presence. He was also not provided any opportunity to cross-examine the prosecution witnesses appeared against him in the so-called inquiry. Similarly, he was not provided any chance to produce his defence in support of his version. But the inquiry officer, on the basis of bald and naked evidence, held the appellant guilty of the charges and recommended for action under the law.
12. That thereafter, the appellant was served with a show cause notice wherein the following allegations were levelled against him:-
 - a) As a result of "preliminary inquiry" conducted by Superintendent of Police, Investigation Mardan, you have close association with the relatives of PO Kabeer Khan.
 - b) That you have also provided help with them. These facts have been verified from your mobile data.

(Copy of show cause notice is appended as Annex-G).

13. That the appellant submitted reply and denied the allegations by stating that he had neither any association with the relatives of PO "Kabeer Khan" nor he ever helped them in any occasion. He further clarified that he had made sincere efforts to arrest the proclaimed offender "Kabeer Khan" alongwith other accused and therefore, conducted several raids in this respect but the former was not found there at the relevant time. He added that Haji Ahmad R/O Chamdheri (father of PO Kabeer Khan) moved an application to the Chairman "(MUSALEHATI COMMITTEE" PS Choorā to make efforts for compromise between the said parties so as to save them from further human loss. In the above application, the appellant was also requested to play an effective role in the matter. He further added

that he had performed his duty justly, fairly and in accordance with law. He therefore, termed the allegations as fallacious, malicious and misconceived. He prayed that he may be exonerated of the charges levelled against him in the show case notice (**Copies of reply, daily diary and application are appended as Annex-H to J**).

14. That the aforesaid reply was not found satisfactory and as such the appellant was straightaway awarded major penalty of dismissal from service by an order dated 27-8-2014 passed by the Deputy Inspector General of Police, Mardan Region-I, Mardan (respondent No.2) (**Copy of impugned order is Annex-K**).
15. That the appellant felt aggrieved by the said order, filed a departmental appeal with the Provincial Police Officer, Khyber Pakhtunkhwa (respondent No.1) on 3-9-2014 within the statutory period of law, requesting therein for re-instatement in service with full back wages and benefits (**Copy of departmental appeal is appended as Annex-L**).
16. That the departmental appeal was neither decided within the statutory period of law with cogent reasons nor any information whatsoever was given to the appellant as required under **Article 19-A of the Constitution of Islamic Republic of Pakistan 1973**. Thus, the Appellate Authority has blatantly violated the provision of law as well as Constitution and the Principle laid down by **August Supreme Court of Pakistan** in case reported in **2011 SCMR 1 (Citation -B)**. The relevant citation is reproduced herein for facility of reference:-

(b) General Clauses Act (X of 1897)---

---S. 24-A ---Speaking order- Public functionaries are bound to decide cases of their subordinates after application of mind with cogent reasons within reasonable time.

It is well settled law that the decision of august Supreme Court of Pakistan is binding on each and every organ of the State by virtue of Article 189 and 190 of the Constitution of Islamic Republic of Pakistan, 1973. Reliance can be placed on the judgment reported in **1996-SCMR-Page-284 (Citation-C)**. The relevant citation is as under:-

(c) Constitution of Pakistan (1973)

Arts. 189 & 190--- Decision of Supreme Court—Binding, effect of--- Extent— Law declared by Supreme Court would bind all Courts, Tribunals and bureaucratic set-up in Pakistan.

17. That the appellant is jobless since his dismissal from service.
18. That the appellant now files this appeal before this Hon'ble Tribunal inter-alia on the following grounds within the statutory period of law.

GROUND OF APPEAL

- A. That respondents have not treated appellant in accordance with law, rules and policy on the subject and acted in violation of **Article 4 of the Constitution of Islamic Republic of Pakistan, 1973**. Therefore, impugned order is not sustainable in the eye of law.
- B. That the appellant was a civil servant and was required to be dealt with in accordance with "**Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011**". But the Competent Authority failed to do so and initiated disciplinary action against the appellant under "**Police Rules 1975**". Thus, the entire process of initiating disciplinary action against the appellant from the top to bottom is "**Coram Non Judice**". Therefore, the unilateral impugned order was malafide, incompetent, capricious, perverse having no sanction of law, was in excess of powers, in derogation of settled rules and principle of law, against the public policy and also against the interest of Public Authority and trust. Hence, the impugned order is liable to be set aside on this count alone.
- C. That no fair and impartial inquiry was constituted against the appellant in order to substantiate his guilt in respect of allegations levelled against him in the show cause notice. The appellant neither associated with the said inquiry nor any witness was examined in his presence. He was also not provided any opportunity of cross-examination. Similarly, he was not provided any chance to produce his defence. Thus, the appellant has been condemned/penalized without being heard, contrary to the basic principle of natural justice known as "**Audi Alteram Partem**". Therefore, the impugned order is against the spirit of administration of justice.
- D. That the Competent Authority (respondent No.2) was under statutory obligation to have served a charge sheet alongwith statement of allegations on the appellant so as to enable him to explain his position in respect of the allegations levelled against him in the so-called complaint made by Wali Dad S/O Rahim Dad. But he failed to do so and as such blatantly violated the law and rules. Hence, the impugned order has no sanctity under the law.
- E. That the Competent Authority (respondent No.2) was legally bound to have conducted "**Full Fledged Inquiry**" in order to find out the

truth in respect of allegations levelled against the appellant as per law laid down by august Supreme Court of Pakistan in cases reported in 2008-SCMR-1369 & 2009-SCMR-412. The relevant citations of the said judgments are reproduced herein for facility of reference:-

Removal from Service (Special Powers) Ordinance (XVII of 2000)

----S. 5---Misconduct---Dismissal from service---Non-holding of departmental Enquiry--- Violation of principles of natural justice---Effect---Held, in case of imposing a major penalty, the principles of natural justice required that a regular enquiry was to be conducted in the matter and opportunity of defence and personal hearing was to be provided to the civil servant proceeded against, otherwise civil servant would be condemned unheard and major penalty of dismissal from service would be imposed upon him without adopting the required mandatory procedure, resulting in manifest injustice.

(c) Government Servants (Efficiency and Discipline) Rules, 1973-

----R. 5---Major penalty, awarding of---Principles---In case of awarding major penalty, a proper inquiry is to be conducted in accordance with law, where full opportunity of defence is to be provided to delinquent officer.

Hence, the impugned order is not warranted under the law.

- F. That the Competent Authority was bound under the law to examine the record of inquiry in its true perspective and in accordance with law and then to apply his independent mind to the merit of the case but he failed to do so and awarded major penalty of dismissal from service to the appellant despite the fact that the so-called "preliminary inquiry" was conducted in absence of appellant in utter violation of **Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973**. Thus, the impugned order is not tenable under the law.

- G. That one Wali Dad S/O Rahim Dad made a complaint against the appellant and Daud Khan (SI) but disciplinary action was only initiated against the appellant and thereafter, he was dismissed from service. Thus, the appellant has been discriminated and treated unfairly qua his colleague (Daud Khan) similarly placed employee. This is a disparity and anomaly and is also violation of **Article 25 of the Constitution of Islamic Republic of Pakistan, 1973** which has unequivocally laid down that all citizens placed in similar circumstances are entitled to equal treatment and protection of law. The Hon'ble Supreme Court of Pakistan through various judgments has maintained that equal treatment is the fundamental right of every citizen. Hence, impugned order is bad in law.
- H. That the Competent Authority was under statutory obligation to have provided a copy of inquiry report to the appellant but he failed to do so and as such blatantly violated the law laid down by **August Supreme Court of Pakistan reported in 1984-SCMR-451 (citation-a)**. The relevant citation is as follows:-

Constitution of Pakistan (1974)----

----- Art. 212(3)--N: W. F. P. Civil Servants (Efficiency and Discipline) Rules, 1973, r. 5-Civil----services-----Departmental enquiry-Order of dismissal of civil servant passed without supplying copy of enquiry report and issue of second show-cause notice-Held, violation of Rules and hence set aside.-[Civil service]

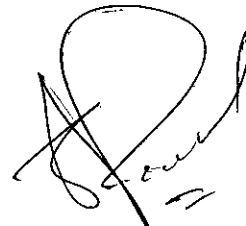
Thus, the impugned order is against the legal norms of justice.

- I. That mobile data in respect of appellant is immaterial as the same was neither confronted nor the person who produced such data was cross-examined by the appellant to dig out the truth. Moreover, the said mobile numbers were also not registered in the name of PO Kabeer Khan. But the fact is that Haji Ahmad & Nigar Ali were the legal subscribers of the said mobile numbers as apparent from their affidavits. They also admitted that they had talked with the appellant on the disputed mobiles (numbers) regarding the matter of compromise only. But the Competent Authority while passing the impugned order has over looked this important aspect of the case and as such it has caused a grave injustice to the appellant (**Copies of affidavits and mobile data are appended as Annex-M to O**).
- J. That the Competent Authority has passed the impugned order in mechanical manner and the same is perfunctory as well as non-speaking and also against the basic principle of administration of justice. Therefore, the impugned order is not tenable under the law.

- K. That the impugned order is based on conjectures and surmises. Hence, the same is against the legal norms of justice.
- L. That the impugned order is suffering from legal infirmities and as such the same is not tenable under the law.
- M. That the appellant would like to seek the permission of this Hon'ble Tribunal to advance some more grounds at the time of arguments.

In view of the above narrated facts and grounds, it is, therefore, humbly prayed that the impugned order No. 5725-26/ES dated 27-8-2014 passed by the Deputy Inspector General of Police, Mardan Region-I, Mardan, may very graciously be set aside and the appellant may kindly be reinstated in service with full back wages and benefits.

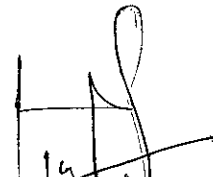
Any other relief deemed proper and just in the circumstances of the case, may also be granted



Appellant

Dated: 11-12-2014

Through



Rizwanullah

M.A. LL.B

Advocate High Court, Peshawar.

**BEFORE THE HON'BLE CHAIRMAN, KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. _____/2014

1. Shah Rasool, Ex-Sub Inspector R/O Sugar Mills Road, Waheedabad near Total Pump, Bagh-e-Haram, District Mardan.

APPELLANT

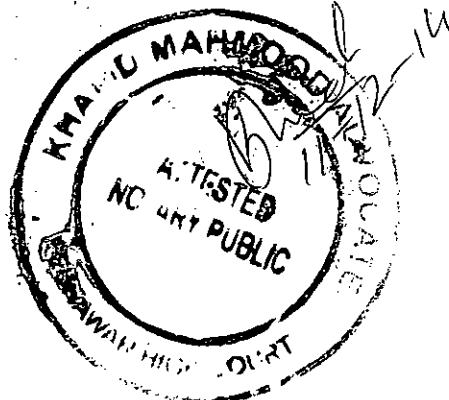
VERSUS

1. The Provincial Police Officer, Government of Khyber Pakhtunkhwa & others.

RESPONDENTS

AFFIDAVIT

I, Shah Rasool, Ex-Sub Inspector R/O Sugar Mills Road, Waheedabad near Total Pump, Bagh-e-Haram, District Mardan, do hereby solemnly affirm and declare that the contents of the accompanied service appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.



Deponent

کاپی نمبر ۱۳۰۲

نائب

نمبر ۱۱۵-۱۳

ابتدائی اطلاع رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زبردستی ۱۵۲ نمبر ضابطہ خودداری

تاریخ وقت رپورٹ	303	44
تاریخ وقت	2:15:30	وقت
نام سکونت اطلاع دہندہ	حاجی جلال	
تفصیل نسبت جرم (مصدر اطلاع دہندہ)	AF 3/4/1500/183 WDC	
جائے وقوع، قاضی قاضی سے درست	حجرہ اذان بازار حیدرآباد	
نام سکونت جرم	شہنشاہ صاحب آباد	
کارروائی جو تفتیش کے نتیجے میں کی گئی اگر اطلاع دہندہ کے خلاف تفتیش ہو تو بیان کرنا	پسندیدگی و اسے خود دہندہ کے خلاف تفتیش ہو کر	
تفصیل سے رہائی کی تاریخ وقت	پسندیدگی و اسے	

ابتدائی اطلاع شیخ درج کردہ وقت صبح ۷ بجے تقریباً ۷ بجے
 ڈاکٹر صاحب نے نسبت کئی اہل سن ۶۶۳ (پہلو اور درج زین) سے خدمت دہریہوں کو متعلقہ
 (موضعیہ سے کئی اہل سن ۹۶۳) ۳۶۲ نمبر خواتین 307 (۱۶۶) 308 (2) سے ملنے کو متعلقہ
 نمبر پر جانے کے بعد یہاں کئی خواتین کئی خواتین کی نسبت جاری مصلحتاً مبرا اہل سن
 31-16 صفحہ ۲۰۱ شہنشاہ صاحب آباد بازار حیدرآباد سندھ شاہ صاحب آباد بازار حیدرآباد سندھ
 307/308/309 صفحہ ۲۰۱ شہنشاہ صاحب آباد بازار حیدرآباد سندھ شاہ صاحب آباد بازار حیدرآباد سندھ
 کی نسبت صفحہ ۲۰۱ شہنشاہ صاحب آباد بازار حیدرآباد سندھ شاہ صاحب آباد بازار حیدرآباد سندھ
 خان آمدی بازار حیدرآباد سندھ شاہ صاحب آباد بازار حیدرآباد سندھ شاہ صاحب آباد بازار حیدرآباد سندھ
 منبری 303 (1/4) صفحہ ۲۰۱ شہنشاہ صاحب آباد بازار حیدرآباد سندھ شاہ صاحب آباد بازار حیدرآباد سندھ
 کتات سے ملنے کے بعد فروری ۱۹۶۳ء میں کئی دفعہ جیل میں بھی گیا۔ C. D. (۲۰۱) صفحہ ۲۰۱
 ۱۹۶۱ء میں ناقد لکھنے کے بعد فروری ۱۹۶۳ء میں کئی دفعہ جیل میں بھی گیا۔ C. D. (۲۰۱) صفحہ ۲۰۱
 ۱۹۶۱ء میں ناقد لکھنے کے بعد فروری ۱۹۶۳ء میں کئی دفعہ جیل میں بھی گیا۔ C. D. (۲۰۱) صفحہ ۲۰۱
 مریض دہریہوں سے متعلقہ نسبت کئی اہل سن ۱۹۶۳ (ارسال نظام) کے معنی شہنشاہ صاحب آباد بازار حیدرآباد سندھ
 دستخط شدہ شاہ صاحب آباد بازار حیدرآباد سندھ شاہ صاحب آباد بازار حیدرآباد سندھ شاہ صاحب آباد بازار حیدرآباد سندھ
 جرم دفعہ ۱۱۵-۱۳ نمبر ۱۱۵-۱۳ نمبر ۱۱۵-۱۳ نمبر ۱۱۵-۱۳ نمبر ۱۱۵-۱۳ نمبر ۱۱۵-۱۳ نمبر ۱۱۵-۱۳
 بدست آمدہ کئی اہل سن ۱۹۶۳ (ارسال نظام) کے معنی شہنشاہ صاحب آباد بازار حیدرآباد سندھ

Alkhawar Asif P S Chaur a 2-8-14

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Annex-D

مرد 31 و النبی ساہ رسول خان 940 وقتاً 14:00 بجے صبح 7/11 میں سے ڈاؤنڈ خان کی و دیگر نوئی
 سندس مہمان پوس میں آئے اور فریقت جمعیہ زنی سے واسی مل۔ دوران جمعیہ زنی مختلف 1955
 میں آمد پوس کی فریقت جمعیہ زنی کی گئی۔ دوران جمعیہ زنی فریقت خاص کی اطلاع پر تم مجرم استعماری
 زاہد ولا شاہ عثمان ساہن میڈیٹھری میں موجودہ۔ اس کی اطلاع کو صدر قاتان
 قاتان حورہ مجرمہ آذان پتھر واقع میڈیٹھری میں موجود ہے۔ اسی اطلاع کو صدر قاتان
 پتھر (مجرمہ استعماری) میڈیٹھری واقع میڈیٹھری میں جمعیہ زنی کی گئی۔ مگر 1955 مذکورہ عام
 مالو کی جانب سے ہرادرہ 1955 ساہد زمان ولد شاہ عثمان (2) سعید باچا ولد باہدہ
 (3) پتھر ولد وی داد (4) خان تاج ولد علی العموم (5) امیرنزی ولد دلا اور ساہن پتھر
 (6) پتھر ولد شاہد عثمان ساہن ماسک باچا گنڈر حال جاوید آباد کو موجود باچر جن میں سے شاہد
 زمان سے پتھر 30 بور نمبری 31058757 سے پتھر خارج نمبر 1955 عدد کارٹوس 30 پتھر بلا
 لائسنس سعید باچا کے قبضہ سے ایکٹوں پلاٹنوف نمبری 8152218 سے فکس خارج جگہ
 خان تاج کے قبضہ سے ایکٹوں پتھر جگہ امیرنزی کے قبضہ سے پتھر سے 2 عدد کارٹوس
 جگہ پتھر کے قبضہ سے ایکٹوں پتھر نمبری 3163115 سے فکس خارج پتھر ایکٹوں
 سر (قبضہ پوس کی گئی) جبکہ دوران عام تلاشی مذکورہ امیرنزی ولد دلا اور سے از قسم کیوں
 حوالہ نہ آئے امیرنزی نمبری 8395764-0302 سے مجرم استعماری کا حوالہ پتھر نمبری
 03065737281 جبکہ ملزم رفیق کا حوالہ پتھر نمبری 9059733-0313 از قسم نوکیا حوالہ پتھر
 مجرم استعماری کا حوالہ پتھر نمبری 5737281-0306 جبکہ ملزم سعید باچا سے از قسم نوکیا
 حوالہ پتھر نمبری 9890185-0315 سے مجرم استعماری کا حوالہ پتھر نمبری 03065737281
 سے بہتر نہ کر کے جو مجرم استعماری کو مذکورہ مان سناں امیرنزی سے ہر قسم امداد اور
 ہر قسم اطلاع اور وقتاً فوقتاً پوس کی نقل جو کہ سے باخبر تھا۔ اور ان سے حوالہ پتھر
 مذکورہ تفہیم کیلئے قبضہ پوس میں کی گئی ہے مذکورہ مان سناں کو سربلک 11/11 21615AA نان خیار
 واملہ پتھر نامی قسم از سال تھا گیا جس سے قبضہ ملے 31058757 11/11 21615AA نان خیار
 مذکورہ حوالہ پتھر مان سناں کو سربلک صبر مان کا پتھر صبر پتھر مان سے
 مذکورہ قبضہ تلاشی صبر مان (لا مینر محالوں سے) تھا کہ سے دیگر قبضہ گوری دونوں
 حوالہ پتھر مان و آمدہ پتھر پتھر مان کو سربلک حوالہ پتھر مان سے امداد پتھر مان



ATTACHED
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تعلیٰ بطریق اعلیٰ
 نالہ
 nmpschm
 11-7-14

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گورنمنٹ ہسپتال D. 1. 6 مہاراجہ کولہ جی ہسپتال - راولپنڈی

سرکار ہسپتال واقعہ

488 سے 23 ⁷/₁₃ 302 ³²⁴/_{148/149} 302 ³²⁴/_{148/149} 302 ³²⁴/_{148/149}

درخواست گزار قسطنطنیہ ہسپتال کے مندرجہ
1۔ شاہ رسول خان 445 کی پانچ پورہ - منگ دہا
2۔ داد خان 445 کی پانچ پورہ - منگ دہا
پورہ 445 کی پانچ پورہ - منگ دہا

ذرا سیٹھ خیر علی

1۔ یہ رقم اور تمام کے فائدے اور منڈیاں بدھ کے مابین تقسیم کی
شخصی حلی آرہی ہے۔ اور منڈیاں بدھ کے نام کے حلی کی گئی ہیں
اور منڈیاں کے منسب سے بدھ کے نام پر لکھی گئی ہیں۔
2۔ یہ منڈیاں بدھ کے نام سے واقف خان - منگ دہا کی فائدہ میں ہیں۔

3۔ یہ رقم 2 ⁸/₁₄ کے لیے اور باقی بچنے والی رقم منگ دہا کے لیے
صرف ہے۔ یہی رقم اور منسب سے فونڈ اور وارث خان کے فائدہ میں
تقسیم کی گئی ہے۔ اور یہ رقم منگ دہا کے فائدہ میں ہے۔
یہ فونڈ اور وارث خان کے فائدہ میں ہے اور منگ دہا کے فائدہ میں
سیرس پانچ آئے۔ اور 445 کی تمام منڈیاں منگ دہا کے فائدہ میں
لکھی گئی ہیں اور منگ دہا کے فائدہ میں منگ دہا کے فائدہ میں
اور منگ دہا کے فائدہ میں منگ دہا کے فائدہ میں۔

جیل سے لکھی گئی اور منگ دہا کے فائدہ میں منگ دہا کے فائدہ میں
نے گاؤں کے منگ دہا کے فائدہ میں منگ دہا کے فائدہ میں
اور منگ دہا کے فائدہ میں منگ دہا کے فائدہ میں۔

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اردو میں کتب و رسائل کی اشاعت کو فروغ دینے اور پڑھنے والوں کی دلچسپی کو بڑھانے کے لیے
شمارہ 540 سے لے کر 545 تک کے شماروں کی اشاعت ہوگی۔

4. اردو میں کتب و رسائل کی اشاعت کو فروغ دینے کے لیے -

اردو میں کتب و رسائل کی اشاعت کو فروغ دینے کے لیے -
اردو میں کتب و رسائل کی اشاعت کو فروغ دینے کے لیے -

اردو میں کتب و رسائل کی اشاعت کو فروغ دینے کے لیے -
اردو میں کتب و رسائل کی اشاعت کو فروغ دینے کے لیے -

5. اردو میں کتب و رسائل کی اشاعت کو فروغ دینے کے لیے -
اردو میں کتب و رسائل کی اشاعت کو فروغ دینے کے لیے -

اردو میں کتب و رسائل کی اشاعت کو فروغ دینے کے لیے -
اردو میں کتب و رسائل کی اشاعت کو فروغ دینے کے لیے -

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اردو میں کتب و رسائل کی اشاعت کو فروغ دینے کے لیے -
اردو میں کتب و رسائل کی اشاعت کو فروغ دینے کے لیے -

ATTESTED

SHOW CAUSE NOTICE

(Under Rules 5 (3) KPK Police Rules, 1975)

1. That you SI Shah Rasool while posted as SHO Police Station Choorra have rendered yourself liable to be proceeded under Rules 5 (3) of the Khyber Pakhtunkhwa Police Rules 1975 for the following misconduct:
 - i. As a result of preliminary enquiry conducted by Superintendent of Police, Investigation, Mardan, you have close association with the relatives of PO Kabeer Khan.
 - ii. That you have also provided help with them. These facts have been verified from your mobile data.
 - iii. Being Station House Officer of the Police Station Choorra, such act amounts to a grave misconduct on your part which renders you liable for Minor/Major penalty under Police Rules, 1975.
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?
9. Grounds of action are also enclosed with this notice.

ATTESTED

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(Signature)
 (MOJIB ULLAH SAEED)PSP
 Deputy Inspector General of Police,
 Mardan Region-I, Mardan

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To

The Deputy Inspector General of Police Mardan region -1 Mardan

Subject: REPLY TO THE SHOW CAUSE NOTICE NO.2139/PA DATED 20-08-2014

R/Sir,

It is submitted that :

That I was issued with the subject show cause Notice with the following allegations.

- i) As a result of preliminary inquiry conducted by superintendent of police , Investigation, Mardan, you have close association with the relatives of PO Kabeer Khan.
- ii) That you have also provided help with them. These facts have been verified from your mobile data.

(A) The matter in question pertains to the following cases:

1. Case FIR No.310 dated 11-07-2014 u/s 216 PPC / 15AA PS Choorā.
2. Case FIR No.362 dated 02-08-2014 u/s 15AA PS Choorā.
3. Case FIR No.363 dated 02-08-2014 u/s ¼ AF / 15 AA PS Choorā.

(B) Brief Facts of the above mentioned cases are as under:

There are two rival groups in village Chamdheri. One group is named Kabeer party and the other group is named with Qaisar Party. Both the groups are the bona fide residents of the same village. Kabeer himself is a proclaimed offender.

On 11-07-2014, I received an information that PO Zahid s/o Shah Jahan r/o chamdheri Wanted in case FIR No. 166 dated 21-04-2014 u/s 302 /34 PPC PS Choorā (A close friend Qaisar s/o wali dad r/o chamdheri) is present in the Hujra of Qaisar group.

I raided the said Hujra for the arrest of the PO Zahid but he was not found there, however the following persons who are harboring and helping the said PO were found present in the Hujra. The unlicensed weapons were recovered from their possession, whose details are as under:

1. Qaisar s/o wali dad r/o chamdheri (recovered one shot gun with 05 cartridges)
2. Saeed Bacha s/o Bacha said r/o chamdheri (recovered one klashan kov with 22 rounds)
3. Shahid s/o Shah Jahan r/o hamdheri (recovered one pistol 30 bore with 10 rounds)
4. Khan Taj s/o Abdul Qayyum r/o Chamdheri (recovered pistol 30 bore with 12 rounds)
5. Amraiz s/o Dilawar r/o chamdheri (recovered pistol 30 bore with 02 rounds)
6. Umer Muhammad s/o Muhammad Rehman r/o Gadar (Recovered pistol 30 bore with 07 rounds)

A proper case vide FIR No. 310 dated 11-07-2014 u/s 16 PPC / 15 AA PS Choorā was registered against the above six mentioned accused. They were arrested in the case and on the following day, they were sent to judicial lock up. Beside the above recovery , the suspected mobile sets were also recovered from the possession of Qaisar , Amraiz and Saeed Bacha respectively. These mobile sets were took into possession and to this effect , a detailed report was entered in the daily diary vide DD No.31 dated 11-07-2014 P S Choorā. (Copy of FIR No.310 + DD Report No.31 are Annexed as Annexure "A" & "B" respectively).

(C) On 02-08-2014, an informer from Qaisar Group informed me that his opponent PO Khushdil s/o waris khan r/o chamdheri wanted in case FIR No.488 dated 13-07-2013 u/s 302/324 PPC PS Choorā is present in his house. I raided the houses of the PO along with police party. PO Khushdil duly armed with rifle M 16 with 84 rounds and pistol 30 bore with 28 rounds was found present in his house. PO K hushdil was arrested and the unlicensed weapon recovered from his possession took into possession. A proper case vide FIR No.362 dated 02-08-2014 u/s 15 AA PS Choorā was registered against PO Khushdil. The arrested accused Khushdil was brought to police station and confined to police lock up. The same day when I came back to police station after conducting raid on the house of PO Khushdil, I received information that opponent PO Khushdil i.e Qaisar group has started indiscriminate areal firing to show their happiness on the arrest of PO Khushdil. To avoid any expected un-toward situation in the village, I immediately directed patrolling officer SI Daud to visit village chamdheri and take necessary legal action against those persons who are involved in aerial firing. (Copy of FIR No.362 is annexed as Annexure "C")

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(D) The same day SI Daud Khan went to village chamdheri and registered a case vide FIR No.363 dated 02-08-2014 u/s ¼ AF / 15 AA / 188 PS Choorā for making aerial firing against the following accused .

1. Kifayat s/o Bawar r/o Chamdheri
2. Saeed Bacha s/o Bacha said r/o Chamdheri
3. Hamad s/o Amin Khan r/o Chamdheri
4. Abdus Salam r/o Rahim Dad r/o Chamdheri
5. Tahir Dad s/o Rahim Dad r/o Chamdheri

Accused Kifayat and Tahir Dad were arrested red handed from the spot. One pistol 30 bore with 16 rounds was recovered from the possession of one accused Kifayat where as the remaining three accused de camped from the spot. After few days accused saeed bacha, Hamad and abdu salam obtained bail before arrest in the case from the competent court of law and the next date of hearing is fixed for 28-08-2014. (Copy of FIR 363 is annexed as Annexure "D")

(E) It would be not out of place to mention here that in case FIR No.310 and case FIR No. 363 all the involved / arrested accused are from the Qaisar group. The father of Qaisar namely wali Dad became annoyed from me by taking legal action against his sons/brothers and resultantly Wali Dad s/o Rahim Dad r/o chamdheri submitted a complaint application against me to the worthy DIG Mardan. Wali Dad has leveled the false and baseless allegations against me that I had some sympathy with his opponent Kabeer group. According to my reliable source wali dad had submitted complaint against me on the direction / abatement of inspector Bacha said posted as CO investigation Mardan. The motive behind is that in case FIR No. 310, I had recovered one klashan kov with 22 rounds from the possession of his son saeed bacha upon which he became annoyed from me (Copy of the application is annexed as Annexure "E").

That The said application of wali dad was marked to SP investigation for inquiry, who submitted his finding before the DIG Mardan and in the light of the inquiry finding, the subject show cause Notice was issued to me. (Copy of Show cause Notice is annexed as Annexure "F").

Explanation to the allegations mentioned in the show cause Notice:

1. This allegation is false and based on personnel grudge. I have no association with the relatives of PO Kabeer. In fact this allegation has been leveled by the applicant as I have already taken a comprehensive legal action against his sons and brothers, as evident from case FIR No.310 and case FIR No.363.
2. As per the allegations that the facts has been verified from my mobile data are concerned, the actual position is that on 02-08-2014 Haji Ahmad r/o Chamdheri (Father of PO Kabeer) submitted an application to chairman Islahi committee PS Choorā to intervene in the enmity of both groups for effecting compromise before them. In the said application, I was also requested to do the needful in the matter. Since then I have started my efforts in the said compromise. Applicant Haji Ahmad is holding mobile SIM No. 0346-9792885 and his relative Nigar is holding mobile SIM No. 0301-8361520. we had made contacts to each other on mobile phone at different time for discussion of compromise proceedings. The elders of the area are trying their best to settled the issue between two rival groups. (Copy of application of Haji Ahmad is annexed as annexure "G")
3. That I have been enlisted as constable in the of 1984 in police department. Neither I have been dealt departmentally nor I have been punished throughout my lengthy period of service which is evident from my shining service record.

Keeping in view of the facts and circumstances mentioned in my this detailed reply to the show cause Notice , It is humbly requested that the show cause notice may kindly be filed please.

ARRESTED
A.O.W

Yours Obediently,

SI, Shah Rasool

SHO police station Choorā

District Mardan

25/8/14

ردہ 30 والسی سٹاہ رسول خان کوہا وقت 13150 بجے صفحہ 8/14 میں صفحہ ایم ایم اے حوالہ

دوران ٹکٹ فروخت حجاب زنی اور علامہ ٹکٹ سے والسی ایما دوران حجاب

زنی حجاب وہ 200 کے حکمانا سیر با امید گرفتاری حجاب زنی کنگلی جیبی 200 ٹکٹ

سکتہ گرفتاری مطلوب حوالہ مقدمہ لا 212 صفحہ 4/12 13 بجے 401/400 حجاب زنی حوالہ مقدمہ

205/13 صفحہ 3/13 302-34 448 200 حجاب زنی حوالہ مقدمہ 2114/13 صفحہ 3/13

موجودہ ایما حجاب زنی گرفتاری حجاب زنی کنگلی 200/400 حجاب زنی حوالہ مقدمہ

کیر ولد 108 یا ٹکٹ ایما حجاب زنی گرفتاری حجاب زنی کنگلی 200 حجاب زنی حوالہ مقدمہ 488

23/13 302-324 148.148 حجاب زنی حوالہ مقدمہ 200 حجاب زنی کنگلی

مگر عدم موجودہ جائے اور نہ ہی کوئی غیر قانونی سے برآمد ہوا دیگر دوران ٹکٹ ضحرت آری

تعداد سیر سیر ان دوران کو رخ حجاب زنی حوالہ زنی حجابات مناسب سیری آپ صفحہ 2724 حجاب زنی حوالہ مقدمہ

2022 تا صلح کو صلح وقت حجاب زنی حوالہ مقدمہ ٹکٹ سوارا حجاب زنی حوالہ مقدمہ

روانہ علاقہ ہوں۔

ATTESTED

[Signature]

صاحب دلال
تقل عثمانی اعلیٰ

[Signature]

mm ps chaw
8-8-14

عد 10 والسی سٹاہ رسل خان SHO وقت 10:00 ع ص 26-8-19 میں سے عرفان خان AS
 دیگر تمام ایان رقمہ حوالہ عدلمان عدرا زرافعت علاج کت سے والسی آری دوران کت
 غیر خاص کی اطلاع نہ کہ ۲۵ زاہد ولد سٹاہ جہاں سکیز جنرل عدری مطلوب حوالہ عدتہ
 عد 156 ص 4 وار 302-324 تھان فورہ اراضیات عدری میں موجود ہے اطلاع
 کو عدتہ خان نوئی کو فوروی طور پر مرتبہ وہ آ تا کہ ۲۵ زاہد کی کتاری کو
 یقینی بنائیں۔ اراضیات میں اچھی طرح تلاش کا عمل نہ کیا گیا ہے عدری ۲۵ زاہد
 کے مکان سے باا عدر تھان جھانسی زنی کتگی اور ۲۵ عدرا موجود یا یا عدتہ نہ ہی
 کوئی غیر قانونی کتاری برآمد ہو۔ اسی طرح عرفان استھاری کتیر ولد صاحب احمد مالو
 شیب ولد جہاں احمد مالو سٹاہ عدلمان عدری مطلوب حوالہ عدتہ عد 488 ص 23
 302-324 تھان فورہ کتگی نہ اچھی کتاری جھانسی زنی کتگی۔ عدری ۲۵
 عدم موجود رہا ہے۔ اور عدلمان تلاش نہ ہی کوئی غیر قانونی کتاری برآمد ہوئی
 دیگر کتاری اسٹیم ایان سے درست طور پر داخل کتوت کیتی۔

جان عالی

نقل عدلمان اعلیٰ سے

mm P.S. Chm &c

26-8-19

ATTESTED

A-cw

شہادت نامہ مبارک حضرت مولانا صاحب رحمہ اللہ کے لئے
5410 نمبر تھانہ حورہ

Annex J

درخواست نامہ عدالت فریقین کے مابین

= = = = =

خانہ عالی

تعداد میں ایک ختم شدہ 488 حورہ 2/23 فرم 302/302
148/149

میں مسلم دارولہدایہ دارمکتہ مدرسہ صہبائی کی قسطنطنیہ دارالاسلام
1) حضرت خان ولد خورشید 2) واقف خان ولد خورشید 3) خورشید ولد خورشید
4) بکھوہ حکامی آملہ 5) شعیب ولد خورشید
انہوں نے دیوانہ اور دشمنی فریقین کے مابین جاری ہے۔ اور علاقہ کے مشہور
کا ذکر ہے جس میں شہداء کی گواہی ہے۔ قریباً فریقین کے درمیان ایک روایت

فریقین کے درمیان

کا نزدیک رشتہ داران میں - جس میں کسی کو دست خانہ اور عالی درجہ ہے
- دکن کو طلب کریں لہذا اس پر سزا کی ضرورت ہے۔ جو کہ عدالت نے فریقین کے مابین جاری کیا
موجودہ عالی کسی طرح شریفہ درخواست (مدرسہ صہبائی) مابین واقفانہ کی گواہی
ان کے کسبالات کی گواہی ہے۔ اور 5410 کا نمبر اور آئی ایم آر کے درمیان - تاکہ
بہ خاندان اور خرید لہذا اس سے بچ جائے۔ گواہوں کے پاس ہے۔

انحراف 8/02

الفارصہ

5410
63

موجودہ عالی کسی طرح شریفہ درخواست (مدرسہ صہبائی) مابین واقفانہ کی گواہی
ان کے کسبالات کی گواہی ہے۔ اور 5410 کا نمبر اور آئی ایم آر کے درمیان - تاکہ
بہ خاندان اور خرید لہذا اس سے بچ جائے۔ گواہوں کے پاس ہے۔

ATTESTED

Adw

Annex-K

ORDER.

This order will dispose-off a Show Cause Notice under Police Rules 1975, served upon SI Shah Rasool of Mardan District on account of close association with relative of PO Kabir Khan.

Brief facts of the case are that he while posted as SHO Police Station, Choorra District Mardan, as a result of preliminary enquiry conducted by Superintendent of Police Investigation, Mardan. Mobile data of the delinquent Official was obtained & statements of the concerned persons were recorded. It was found that SI Shah Rasool SHO Police Station, Choorra District Mardan was in league with the relatives of PO Kabir Khan & provides help.

I have perused the record and also heard the appellant in person in Orderly room held in this office on 27.08.2014, 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. Hence, under the FPK Police Rules 1975, I hereby awarded him Major punishment of dismissal from service with immediate effect.

ORDER ANNOUNCED.

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

No. 5725-26 /ES, Dated Mardan the 27/08 /2014.

Copy forwarded to the:-

- 1. District Police Officer, Mardan. }
- 2. PA Region Office, Mardan. }

For information & necessary action.

(*****)

ATTESTED

(Signature)
ACW

BEFORE THE PROVINCIAL POLICE OFFICER KHYBER PAKHTUNKHWA PESHAWAR

Subject: APPEAL AGAINST THE ORDER NO.5725-26 /ES DATED 27-08-014 OF DEPUTY INSPECTOR GENERAL OF POLICE , MARDAN REGION-1 MARDAN, WHERE BY THE APPELLANT WAS AWARDED THE PUNISHMENT " DISMISSAL FROM SERVICE".

R/Sir,

It is submitted that :

1. The DIG Mardan Region-1 Mardan had issued show cause Notice No.2139 / PA dated 20-08-2014 against the Appellant with the following allegations:-
 - a) As a result of preliminary inquiry conducted by superintendent of police , Investigation, Mardan, you have close association with the relatives of PO Kabeer Khan.
 - b) That you have also provided help with them. These facts have been verified from your mobile data.
2. That one Wali dad s/o Rahim dad r/o chamdheri submitted an application against the appellant before DIG Mardan and leveled the false and baseless allegations, the appellant being SHO PS Chooria had some sympathy with their opponents (Kabeer Group). In the light of the said application , a preliminary inquiry was conducted by superintendent of police, investigation, Mardan. On receipt of inquiry finding, the DIG Mardan issued show cause notice to the appellant. (Copy of Application of Wali dad + Copy of show cause notice is annexed as annexure "A" & "B")
3. The appellant submitted a comprehensive and para wise reply to the show cause notice but not considered. On 27-08-2014, the appellant appeared before the worthy DIG Mardan and explained all the facts before his honour that the appellant is completely innocent in the matter but the request of the appellant was turned down and was dismissed from service vide DIG mardan office letter No.5725-26/ES dated 27-08-2014. (copy of dismissal order is annexed as annexure "C")
4. The detail reply to the show cause notice is reproduced below for your kind perusal.

"(A) . The matter in question pertains to the following cases:

1. Case FIR No.310 dated 11-07-2014 u/s 216 PPC / 15AA PS Chooria.
2. Case FIR No.362 dated 02-08-2014 u/s 15AA PS Chooria.
3. Case FIR No.363 dated 02-08-2014 u/s 15 AF / 15 AA PS Chooria.

ATTESTED

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(B) Brief Facts of the above mentioned cases are as under:

There are two rival groups in village Chamdheri. One group is named Kabeer party and the other group is named with Qaisar Party. Both the groups are the bona fide residents of the same village. Kabeer himself is a proclaimed offender.

On 11-07-2014, I received an information that PO Zahid s/o Shah Jahan r/o chamdheri Wanted in case FIR No. 166 dated 21-04-2014 u/s 302 /34 PPC PS Choorā (A close friend Qaisar s/o wali dad r/o chamdheri) is present in the Hujra of Qaisar group.

I raided the said Hujra for the arrest of the PO Zahid but he was not found there, however the following persons who are harboring and helping the said PO were found present in the Hujra. The unlicensed weapons were recovered from their possession, whose details are as under:

1. Qaisar s/o wali dad r/o chamdheri (recovered one shot gun with 05 cartridges)
2. Saeed Bacha s/o Bacha said r/o chamdheri (recovered one klashan kov with 22 rounds)
3. Shahid s/o Shah Jahan r/o hamdheri (recovered one pistol 30 bore with 10 rounds)
4. Khan Taj s/o Abdul Qayyum r/o Chamdheri (recovered pistol 30 bore with 12 rounds)
5. Amraiz s/o Dilawar r/o chamdheri (recovered pistol 30 bore with 02 rounds)
6. Umer Muhammad s/o Muhammad Rehman r/o Gadar (Recovered pistol 30 bore with 07 rounds)

A proper case vide FIR No. 310 dated 11-07-2014 u/s 16 PPC / 15 AA PS Choorā was registered against the above six mentioned accused. They were arrested in the case and on the following day, they were sent to judicial lock up. Beside the above recovery, the suspected mobile sets were also recovered from the possession of Qaisar, Amraiz and Saeed Bacha respectively. These mobile sets were taken into possession and to this effect, a detailed report was entered in the daily diary vide DD No.31 dated 11-07-2014 PS Choorā. (Copy of FIR No.310 + DD Report No.31 are Annexed as Annexure "D" & "E" respectively

(C) On 02-08-2014, an informer from Qaisar Group informed me that his opponent PO Khushdil s/o waris Khan r/o chamdheri wanted in case FIR No.488 dated 13-07-2013 u/s 302/324 PPC PS Choorā is present in his house. I raided the houses of the PO along with police party. PO Khushdil duly armed with rifle M 16 with 84 rounds and pistol 30 bore with 28 rounds was found present in his house. PO Khushdil was arrested and the unlicensed weapon recovered from his possession taken into possession. A proper case vide FIR No.362 dated 02-08-2014 u/s 15 AA PS Choorā was registered against PO Khushdil. The arrested accused Khushdil was brought to police station and confined to police lock up. The same day when I came back to police station after conducting raid on the house of PO Khushdil, I received information that opponent PO Khushdil i.e Qaisar group has started indiscriminate aerial firing to show their happiness on the arrest of PO Khushdil. To avoid any expected un-toward situation in the village, I immediately directed patrolling officer SI Daud to visit village chamdheri and take necessary legal action against those persons who are involved in aerial firing. (Copy of FIR No.362 is annexed as Annexure "F")

(D) The same day SI Daud Khan went to village chamdheri and registered a case vide FIR No.363 dated 02-08-2014 u/s 14 AF / 15 AA / 188 PS Choorā for making aerial firing against the following accused.

1. Kifayat s/o Bawar r/o Chamdheri
2. Saeed Bacha s/o Bacha said r/o Chamdheri
3. Hamad s/o Amin Khan r/o Chamdheri
4. Abdus Salam r/o Rahim Dad r/o Chamdheri
5. Tahir Dad s/o Rahim Dad r/o Chamdheri

Accused Kifayat and Tahir Dad were arrested red handed from the spot. One pistol 30 bore with 16 rounds was recovered from the possession of one accused Kifayat where as the remaining three accused de camped from the spot. After few days accused saeed bacha, Hamad and abdu salam obtained bail before arrest in the case from the competent court of law and the next date of hearing is fixed for 28-08-2014. (Copy of FIR 363 is annexed as Annexure "G")

(E) It would be not out of place to mention here that in case FIR No.310 and case FIR No. 363 all the involved / arrested accused are from the Qaisar group. The father of Qaisar namely wali Dad became annoyed from me by taking legal action against his sons/brothers and resultantly Wali Dad s/o Rahim Dad r/o chamdheri submitted a complaint application against me to the worthy DIG Mardan. Wali Dad has leveled the false and baseless allegations against me that I had some sympathy with his opponent Kabeer group. According to my reliable source wali dad had submitted complaint against me on the direction / abatement of inspector Bacha said posted as CO investigation Mardan. The motive behind is that in case

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FIR No. 310, I had recovered one klashan kov with 22 rounds from the possession of his son saeed bacha upon which he became annoyed from me (Copy of the application is annexed as Annexure "H").

That The said application of wali dad was marked to SP investigation for inquiry, who submitted his finding before the DIG Mardan and in the light of the inquiry finding, the subject show cause Notice was issued to me .

(F) Explanation to the allegations mentioned in the show cause Notice:

1. This allegation is false and based on personnel grudge. I have no association with the relatives of PO Kabeer. In fact this allegation has been leveled by the applicant as I have already taken a comprehensive legal action against his sons and brothers, as evident from case FIR No.310 and case FIR No.363.
2. As per the allegations that the facts has been verified from my mobile data are concerned, the actual position is that on 02-08-2014 Haji Ahmad r/o Chamdheri (Father of PO Kabeer) submitted an application to chairman Islahi committee PS Choorra to intervene in the enmity of both groups for effecting compromise before them. In the said application, I was also requested to do the needful in the matter. Since then I have started my efforts in the said compromise. Applicant Haji Ahmad is holding mobile SIM No. 0346-9792885 and his relative Nigar is holding mobile SIM No. 0301-8361520. we had made contacts to each other on mobile phone at different time for discussion of compromise proceedings. The elders of the area are trying their best to settled the issue between two rival groups. (Copy of application of Haji Ahmad is annexed as annexure "I")
3. That I have been enlisted as constable in the of 1984 in police department. Neither I have been dealt departmentally nor I have been punished throughout my lengthy period of service which is evident from my shining service record."

Conclusion:

It is requested that the Appeal of the Appellant may kindly be accepted and Order of the punishment be set aside on the following grounds:-

1. That from the above detailed reply to the show cause notice, it is crystal clear that the appellant has no association with the relative of Kabeer Khan. In fact Haji Ahmad and his nephew Nigar (the relative of Kabeer Khan) had made contacts with the appellant on mobile phone at different time for the discussion of compromise proceeding. It is also worth considerable that Haji Ahmad had given an application to the chairman Islahi Committee to effect compromise between them. This fact is clear from the application of Haji Ahmad, More over Haji Ahmad and his nephew have voluntarily drafted their written AFFIDAVIT to the effect that being the relatives of kabeer Khan they have no association with the appellant and have rebutted the allegations against the appellant. (copies of written AFFIDAVITS are annexed as annexure "J" & "K")
2. The allegations leveled against the appellant are false, baseless and based on personnel grudges with malafide intentions.
3. Neither proper departmental inquiry was conducted by the competent authority against the appellant, nor any opportunity was given to the appellant to cross examine the witnesses. The preliminary inquiry so far conducted is against the rules / regulations and beyond the requirement of justice.

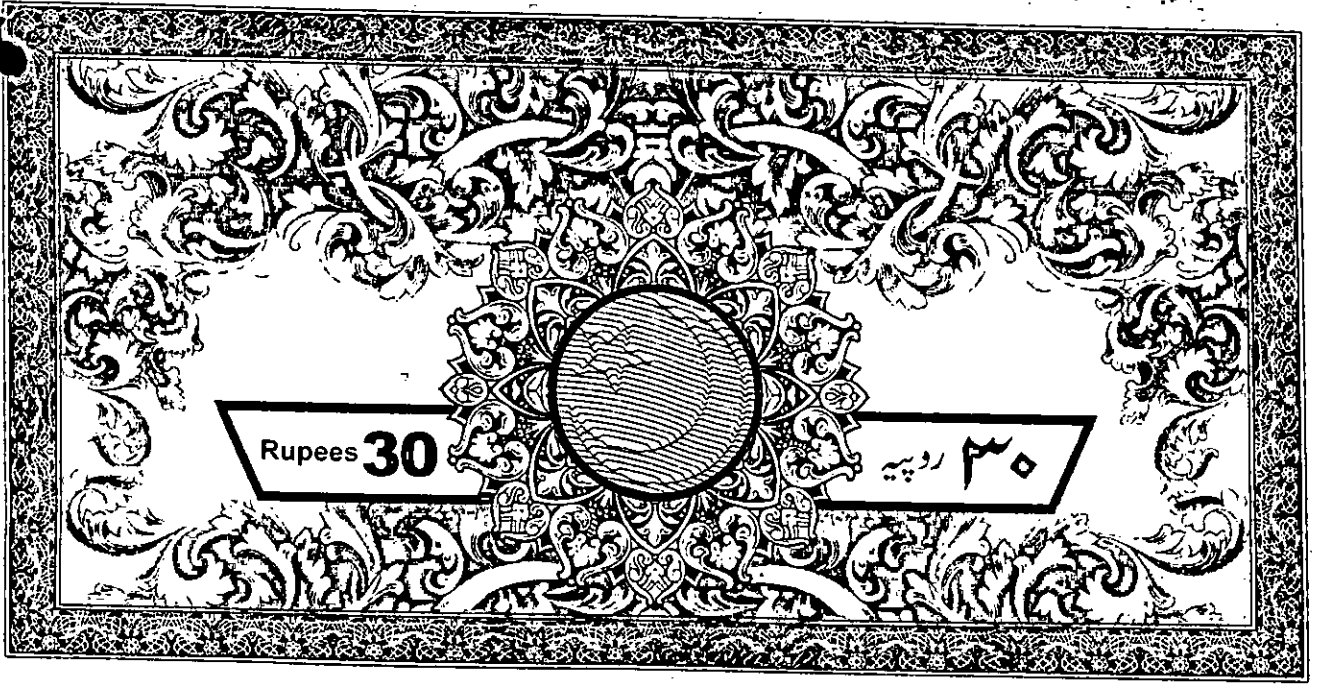
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4. There is no iota of evidence to connect the Appellant with the allegations. Hence , the allegations are of superficial nature.
5. The Appellant was not given final show cause Notice by competent authority, which was the necessary requirement as per relevant rules and thus the illegal Order was passed.
6. In addition to the above facts, the E.O has also made certain irregularities and has dashed the rules and regulations to the ground. The present preliminary inquiry, so far conducted is just an eye wash and fill in the blanks.
7. The Appellant has served the Department for more than 30 years and was at the verge of promotion.
8. The Appellant is having shining Official record and prior to this, the Appellant was not treated departmentally during his whole service.

Keeping in view of the facts and circumstances mentioned above, it is humbly requested that the Appeal of the Appellant may kindly be accepted and the impugned Order passed by DIG Mardan Region-1 Mardan may kindly be set aside.

ATTACHED
 AEW

Yours Obediently
 3-9-2014
Ex-Sub Inspector (Shah Rasool)
 Mardan District Police
 (Now Dismissed from service)



بیان صلی

مستند نگار علی وہ خان رازقی ساکن محلہ بابو ضلع چبہ صوبہ پنجاب وضع

مردان کاہوں۔ حلفاً بیان کرتے تھے دیباہوں۔ کہ من خائف کاوبائیں نمبر 301. 8361520
 جبہ SHB صاحب شاہ رسول خان تھانہ چورہ کاوبائیں نمبر 07429201407 ہے۔ یہ کہ
 عابین من خائف اور SHB صاحب مذکورہ نمبر ات پر رالیا ہوا تھا۔ یہ کہ رالیا نیا برائے راضی
 نام عابین فزائین ذیل تھا۔ تھانہ یڈاکے SHB صاحب نے اشخاری ملزم خوشدل وراث
 کو دفعہ 300 میں گرفتار کر رکھا تھا۔ سو مذکورہ ملزم کی راضی نام کسے عابین من خائف
 اور SHB مذکورہ رالیا ہوا تھا۔ یہ کہ عقول / ملزم ہر دو فزائین من خائف کے قوی پکار تھے دار
 ہیں۔ جبہ مذکورہ کسی مقدمہ میں ملزمان واقف خان دم حوصین، عمر نپروہ حوصین پابند
 سلاسل ہیں۔ اور مردان جس میں پابند ہیں۔ من خائف نے ایک عدد درخواست بابت
 راضی نام عابین فزائین اصلاحی کمیٹی تھانہ چورہ دائر کر رکھی ہے۔ درخواست پڑا کی وجہ سے
 SHB تھانہ چورہ عابین فزائین راضی نام کی کوشش کر رہے ہیں۔ اور من خائف نے وہ
 کر رکھا ہے۔ کہ جلد از جلد ملزمان بھیر خان، شفیق کو بھی قانون کے حوالہ کر دیں گے۔ اس
 راضی نام کے سلسلے میں من خائف کا SHB تھانہ چورہ سے رالیا میں یوں۔ SHB صاحب
 ایک انتہائی فرض شناس اور دیباہدار آفسیئر ہیں۔ اور عابین فزائین بکشت SHB
 راضی نام کر سکتے۔ سو حلفاً بیان ہے۔ کہ مذکورہ راضی نام کی بنا پر عابین من خائف
 اور SHB صاحب رالیا ہے۔ مستند بیان صلی مستند آڈیٹر ہے۔ نمبر 26 اگست 2014

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Nicani

نگار علی

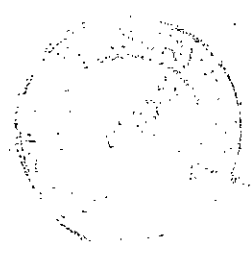


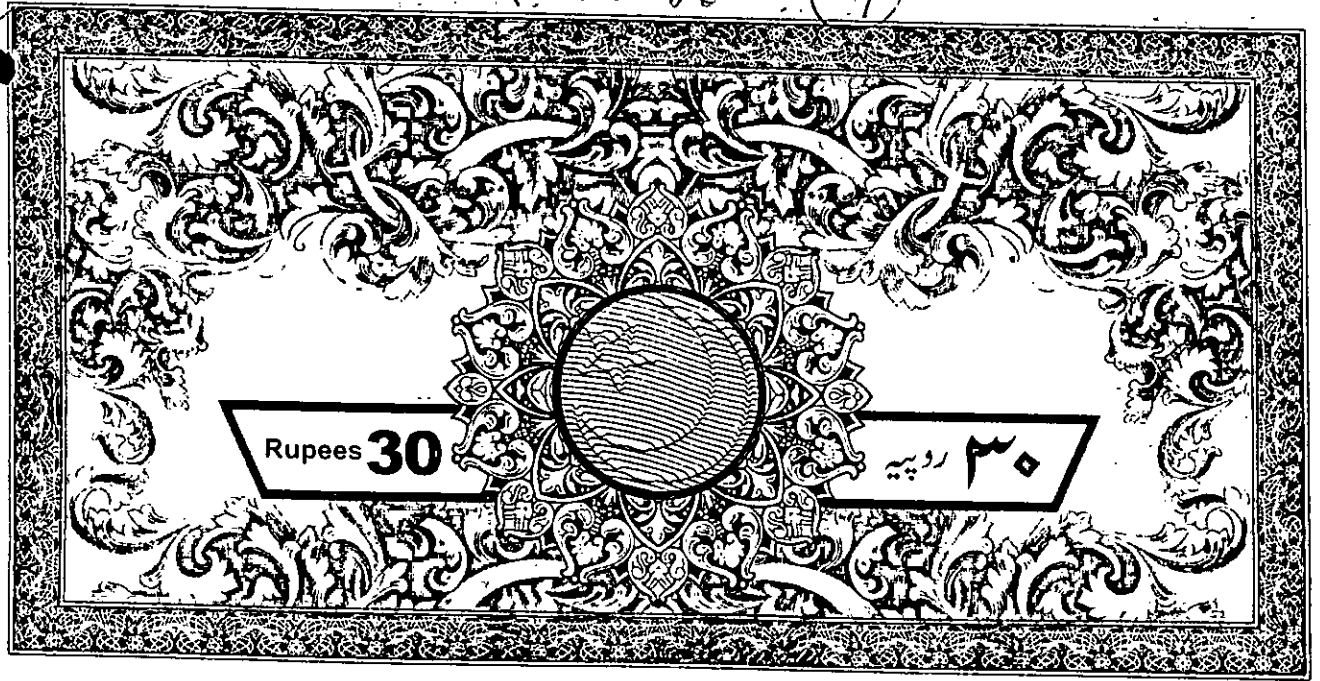
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بیان حلیٰ

منہ حاجی احمد و نہایت خان سائن گاشت آباد چٹھہری تحصیل ضلع مردان
 کامیوں۔ حقا بیان کر کے کچھ دستاویزوں کہ من خالت 5450 صہ شاہ رسول خان تھانہ چورہ
 کو ذاتی طور پر نہیں جانتا۔ اور نہ ہی من خالت کا 5450 صہ سے کوئی راجلا ہے۔ من خالت
 نے اپنے بھائی نگار علی کے ہمراہ ایک عدد درخواست بابت مقدمہ نمبر 302 عابین فریقین راجی نام
 کیسے تحریری درخواست نمبر 248/19 حوالگی کی ہے، 5450 تھانہ چورہ دے رکھی ہے۔ تاہم من خالت
 کا 5450 صہ سے کبھی راجلا نہیں ہوا ہے۔ جبکہ چند دن پہلے من خالت کے حوالے پر
 0346-9792885 سے 5450 صہ تھانہ چورہ سے من خالت کے بھائی نگار علی
 کا راجلا ہوا تھا۔ چونکہ نگار علی کے حوالے میں کریڈٹ ایجنسی قائم ہو گیا تھا۔ اور میں نگار علی
 کے ساتھ موجود تھا۔ اسلئے نگار علی نے مجھ سے حوالے کر کے 5450 صہ سے راجلا لیا جو 5450
 وقت من خالت کو کوئی علم نہ تھا کہ نگار علی نے اس سے راجلا لیا تھا۔ چنانچہ من خالت
 کے حوالے کی بات ہے۔ تو بہ من خالت کا ذاتی بڑے۔ اور چھٹی اس میں میرے نام درج ہے
 من خالت نے اپنے حوالے کا بھی غلط اظہار نہیں کیا ہے۔ اور نہ اس کے من خالت کی
 5450 صہ مذکورہ سے ذاتی تعلق نہیں ہے۔ تاہم لکھا ہے کہ وہ ایشیائی فرما شناس
 اور پانندہ ڈائنسر ہے۔ اور مقدمہ میں ٹیک نام ہے۔ بیان حلیٰ کا مدرسہ علم ولعین
 درست ہے۔ بیہ بیان حلیٰ سند آخری ہے۔

تحریر 26 اگست 2007

ار 9-11-1390ھ-1410ھ

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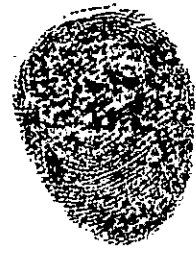
حاجی احمد
Attest



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Annex-0

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Conversation between NIGAR & Sho.choora

MSISDN	CALL ORIG_NUM	IMEI	CALL_START_DT_TM	INBOUND_OUT	Call_No	CALL_TYP	Location
923429201407	923018361520	35914505239136	2014-07-1307:56:08	INCOMING	12	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-1310:30:49	INCOMING	26	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-1311:25:26	INCOMING	79	GSM	VILLAGE BAKHSHALI MOHALLAH GUJRAN PO.BOX BAKHSHALI TEHSIL AND DIST MARDAN Mardan
923429201407	923018361520	35914505239136	2014-07-1312:52:02	OUTGOING	47	GSM	VILLAGE BAKHSHALI MOHALLAH GUJRAN PO.BOX BAKHSHALI TEHSIL AND DIST MARDAN Mardan
923429201407	923018361520	35914505239136	2014-07-1412:53:09	OUTGOING	61	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-1412:53:09	OUTGOING	61	GSM	Village Fatima Mohallah Khatthan Dist Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-1608:57:24	INCOMING	114	GSM	Village Bala Gari P.O Box Shahbaz Gari Tehsil and Dist Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-1620:32:25	INCOMING	43	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-1705:44:36	INCOMING	7	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-1705:44:36	INCOMING	7	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-1706:54:44	OUTGOING	44	GSM	Village Bala Gari P.O Box Shahbaz Gari Tehsil and Dist Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-1706:54:44	OUTGOING	44	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-1920:22:18	INCOMING	150	GSM	VILLAGE BAKHSHALI MOHALLAH GUJRAN PO.BOX BAKHSHALI TEHSIL AND DIST MARDAN Mardan
923429201407	923018361520	35914505239136	2014-07-2011:48:51	INCOMING	18	GSM	VILLAGE BAKHSHALI MOHALLAH GUJRAN PO.BOX BAKHSHALI TEHSIL AND DIST MARDAN Mardan
923429201407	923018361520	35914505239136	2014-07-2011:49:27	INCOMING	101	GSM	VILLAGE BAKHSHALI MOHALLAH GUJRAN PO.BOX BAKHSHALI TEHSIL AND DIST MARDAN Mardan
923429201407	923018361520	35914505239136	2014-07-2011:58:13	INCOMING	12	GSM	Dist & Tehsil Mardan Village Sawaldher Muhallah Khattak Mardan
923429201407	923018361520	35914505239136	2014-07-2011:59:10	INCOMING	16	GSM	Dist & Tehsil Mardan Village Sawaldher Muhallah Khattak Mardan
923429201407	923018361520	35914505239136	2014-07-2020:16:53	INCOMING	160	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2105:20:20	OUTGOING	106	GSM	Village Fatima Mohallah Khatthan Dist Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2105:20:20	OUTGOING	106	GSM	Village Fatima Mohallah Khatthan Dist Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2109:52:45	INCOMING	52	GSM	Village Bala Gari P.O Box Shahbaz Gari Tehsil and Dist Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2110:04:41	INCOMING	0	SMS	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2117:39:29	INCOMING	25	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2118:24:05	OUTGOING	8	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2118:24:05	OUTGOING	8	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2321:47:17	OUTGOING	170	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2321:54:01	OUTGOING	12	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2417:47:33	INCOMING	195	GSM	VILLAGE BAKHSHALI MOHALLAH GUJRAN PO.BOX BAKHSHALI TEHSIL AND DIST MARDAN Mardan
923429201407	923018361520	35914505239136	2014-07-2417:47:33	INCOMING	195	GSM	Village Bala Gari P.O Box Shahbaz Gari Tehsil and Dist Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2420:26:34	INCOMING	49	GSM	VILLAGE BAKHSHALI MOHALLAH GUJRAN PO.BOX BAKHSHALI TEHSIL AND DIST MARDAN Mardan
923429201407	923018361520	35914505239136	2014-07-2618:08:10	OUTGOING	16	GSM	VILLAGE BAKHSHALI MOHALLAH GUJRAN PO.BOX BAKHSHALI TEHSIL AND DIST MARDAN Mardan
923429201407	923018361520	35914505239136	2014-07-2618:10:17	OUTGOING	69	GSM	VILLAGE BAKHSHALI MOHALLAH GUJRAN PO.BOX BAKHSHALI TEHSIL AND DIST MARDAN Mardan
923429201407	923018361520	35914505239136	2014-07-2618:10:17	OUTGOING	69	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2714:21:24	INCOMING	42	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2808:52:25	INCOMING	35	GSM	VILLAGE BAKHSHALI MOHALLAH GUJRAN PO.BOX BAKHSHALI TEHSIL AND DIST MARDAN Mardan
923429201407	923018361520	35914505239136	2014-07-2808:52:25	INCOMING	35	GSM	Village Bala Gari P.O Box Shahbaz Gari Tehsil and Dist Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2816:11:01	INCOMING	72	GSM	Village Bala Gari P.O Box Shahbaz Gari Tehsil and Dist Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2816:20:30	INCOMING	14	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2816:21:51	INCOMING	41	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2820:11:51	OUTGOING	15	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2820:13:31	INCOMING	16	GSM	VILLAGE BAKHSHALI MOHALLAH GUJRAN PO.BOX BAKHSHALI TEHSIL AND DIST MARDAN Mardan
923429201407	923018361520	35914505239136	2014-07-2820:13:31	INCOMING	16	GSM	Abdur Rahman Market Malakand Road Tehsil Takht Bhai Distr Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-2920:08:26	INCOMING	53	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-3016:13:38	OUTGOING	32	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-07-3018:29:42	OUTGOING	23	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0116:14:39	INCOMING	1	GSM	Dist & Tehsil Mardan Village Sawaldher Muhallah Khattak Mardan
923429201407	923018361520	35914505239136	2014-08-0215:24:12	INCOMING	1	GSM	VILLAGE BAKHSHALI MOHALLAH GUJRAN PO.BOX BAKHSHALI TEHSIL AND DIST MARDAN Mardan
923429201407	923018361520	35914505239136	2014-08-0215:24:52	INCOMING	33	GSM	VILLAGE BAKHSHALI MOHALLAH GUJRAN PO.BOX BAKHSHALI TEHSIL AND DIST MARDAN Mardan
923429201407	923018361520	35914505239136	2014-08-0217:21:16	INCOMING	23	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan


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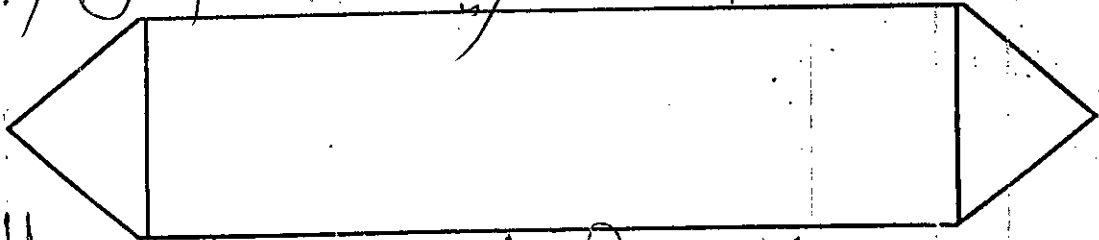
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923429201407	923018361520	35914505239136	2014-08-0510:39:49	OUTGOING	61	GSM	Prime Bank Bank Road Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0614:37:29	INCOMING	129	GSM	Gul Bahae #2 Kas Korona Tehsil and Dist Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0614:58:01	OUTGOING	49	GSM	Gul Bahae #2 Kas Korona Tehsil and Dist Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0617:24:52	OUTGOING	335	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0617:30:41	OUTGOING	15	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0617:33:43	INCOMING	24	GSM	Village Bala Gari P.O Box Shahbaz Gari Tehsil and Dist Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0617:47:37	OUTGOING	45	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0618:10:26	INCOMING	0	SMS	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0618:25:14	INCOMING	37	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0619:18:41	INCOMING	37	GSM	Village Bala Gari P.O Box Shahbaz Gari Tehsil and Dist Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0620:19:15	OUTGOING	259	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0620:38:43	INCOMING	106	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0621:59:02	INCOMING	251	GSM	Commercial Land Near Railway Station Nowshera Road Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0622:20:27	INCOMING	154	GSM	Police Lines Mardan Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0622:43:00	INCOMING	52	GSM	Police Lines Mardan Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0707:42:16	INCOMING	73	GSM	Village Fatima Mohallah Kahthan Dist Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0713:36:20	INCOMING	51	GSM	Bagh Colony Street #4 Sikandari Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0717:10:34	INCOMING	124	GSM	Village Zando Dheri Swabi Road Dist and Tehsil Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0717:18:18	OUTGOING	76	GSM	Village Bala Gari P.O Box Shahbaz Gari Tehsil and Dist Mardan Mardan
923429201407	923018361520	35914505239136	2014-08-0809:44:30	INCOMING	28	GSM	VILLAGE BAKHSHALI MOHALLAH GUIRAN PO.BOX BAKHSHALI TEHSIL AND DIST MARDAN Mardan
923429201407	923018361520	35914505239136	2014-08-0812:21:09	OUTGOING	18	GSM	Gul Bahae #2 Kas Korona Tehsil and Dist Mardan Mardan

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بعدالت جناب جس میں صاحب اس کے لئے منظور کیا گیا



نام: 2 جناب اس کے لئے منظور کیا گیا

Shah Rasool

VERSUS

Provincial Police Officer etc

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام کے لئے اس کے لئے اصولی طور پر

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے دہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا ادکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم 6 ماہ 2014

Handwritten signature

Acceptance کے لئے منظور ہے۔
Handwritten signature

مقام

مقام