KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR AT CAMP COURT SWAT

Service Appeal No. 1675/2022

BEFORE: MRS. RASHIDA BANO ... MEMBER (J)

MR. MUHAMMAD AKBAR KAHN ... MEMBER (E)

Muhammad Ali, Ex Constable NO.765) S/O Muhammad Nazir r/o Faizabad Saidu Sharif District Swat c/o S.P Elite Force Malakand Region Swat. (Appellant)

VERSUS

- 1. Provincial Police Officer Khyber Pakhtunkhwa, Peshawar.
- 2. The Additional Inspector General of Police, Elite Force/Commandant Elite Force Police Khyber Pakhtunkhwa, Peshawar.
- 3. Deputy Commandant Elite Force, Khyber Pakhtunkhwa, Peshawar.
- 4. The Superintendent of Police Elite Force, Malakand Region Swat.

(Respondents)

Mr. Hammad Hussain

Advocate

For appellant

Mr. Muhammad Jan

District Attorney

For respondents

Date of Institution.......25.11.2022

Date of Hearing......07.12.2022

Date of Decision.......07.12.2023

JUDGMENT

RASHIDA BANO, MEMBER (J): Theinstant service appeal has been instituted under section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act 1974 with the prayer copied as below:

"On acceptance of the instantservice appeal, the impugned order dated 26.10.2022issued by Superintendent of Police Elite Force, Malakand region, Swat as well as order dated 10.11.2022 may kindly be set aside and the appellant may please be re-instated into service with all consequential/back benefits."

- 2. Brief facts of the case, as given in the memorandum of appeal, are that appellant is serving as constable in police department under the command of Superintendent of Police, Elite Force Malakand Region, Swat. During service appellant was charged in case FIR No. 308 U/S 324/34/337 A(IV)337-F dated 30.04.2022 at Police Station Saidu Sharif, Swat. Departmental proceedings were initiated against the appellant and he was dismissed from service vide impugned order dated 26.10.2022. Feeling aggrieved, appellant filed departmental appeal on 31.10.2022 which was rejected on 10.11.2022, hence, the instant service appeal.
- 3. Respondents were put on notice who submitted written replies/comments on the appeal. We have heard the learned counsel for the appellant as well as the learned District Attorney and perused the case file with connected documents in detail.
- 4. Learned counsel for the appellant argued that impugned orders are against the law, facts, norms of justice and material on record, therefore, not tenable and liable to be set aside. He contended that no regular inquiry was conducted by the respondents and even no opportunity of self-defence was provided to him. He further contended that the department was in knowledge about the fact that appellant was in judicial lockup and the department could not communicated charge sheet/statement of allegation and show cause notice to the appellant nor statement of the appellant was recorded. He further contended that no opportunity of personal hearing was afforded to the appellant and he was condemned unheard; which is clear violation of the norms of justice. Reliance is placed on 2019 PLC (CS) 255.
- 5. Conversely, learned District Attorney contended that the appellant was treated in accordance with law and rules. He further contended that appellant

was charged in FIR No. 308, he was also remained absent from lawful duty without any leave or prior permission from the competent authority with effect from 26.04.2022 till 28.10.2022. In this regard inquiry was conducted, by appointing Mr. Fahad Khan, DSP as inquiry officer to dig out the real facts of the case after fulfilling all codal formalities the appellant was found guilty. He submitted that departmental enquiry and judicial trial are two separate matters which can be run parallel without affecting each other.

- 6. Perusal of record reveal that appellant was serving as constable in the respondent department when he was charged in criminal case bearing FIR No.308 U/S 324/34/337-F(ii)(vi)A(iv)/15-AA PPC of Police Station Saidu Sharif, Swat, who was arrested by the Police and was behind the bar. Appellant was dismissed from service on ground of his involvement in criminal case and absence from duty vide impugned order dated 26.10.2022 against which appellant's departmental appeal was also rejected vide impugned order dated 10.11.2022.
- 7. It is admitted fact that respondent depargtment had knowledge about involvement of appellant in criminal case then to proceed with the allegation of absence does not make sense. Main allegation against the appellant is his involvement in criminal case bearing FIR No.308 u/s 324/34/337-FA(iv)/15-AA PPC of Police Station Saidu Sharif, Swat dated 30.04.2022. At the time of conclusion of departmental inquiry against the appellant said criminal case was pending adjudication in the competent court of law and was not yet decided then in such a situation it will be appropriate to keep pending the same till the conclusion of criminal trial, but respondent in hurry awarded to the appellant impugned penalty of dismissal from service, which is not in accordance with the principal of justice and law on the subject.

7. It is also evident from the inquiry report that appellant was behind the bar during proceeding of the inquiry and no chance of self-defense and cross examination was provided to the appellant which is the foremost requirement of fair trial. Appellant was acquitted vide judgment dated 25.10.2022. The vary reason/basis upon which appellant was proceeded comes to an end as he was acquitted from charges leveled against him in a criminal case.

8. It has been held by the superior for that all acquittals are certainly honorable. There can be no acquittal which may be said to be dishonorable. Conviction of the appellant in criminal case was the only ground on which he had been dismissed from service and the said ground had subsequently disappeared through his acquittal, making him re-emerge as a fit and proper person entitled to continue his service.

- 9. It is established from the record that charges of his involvement in criminal case ultimately culminated in honorable acquittal of the appellant by the competent court of Law. In this respect we have sought guidance from 1988 PLC (CS) 179, 2003 SCMR 215 and PLD 2010 Supreme Court, 695.
- 10. For what has been discussed above, we set aside the impugned orders and reinstate the appellant by converting major penalty of dismissal from service into minor penalty of stoppage of two annual increments and treat the intervening period as leave without pay. Costs shall follow the event. Consign.
- 11. Pronounced in open court at camp court swat and given under our hands and seal of the Tribunal on this 7th day of December, 2023.

SCANNED KPST Peshawar

(MUHAMMAD AKBAR KHAN)

Member (**E**)
Camp Court Swat

(RASHIDÀ BANO)

Member (J)

Camp Court Swat

*Kaleemullah

ORDER

learned District Attorney alongwith Mr. Niaz Gul, DSP (Legal) for the respondents present.

- 2. Vide our detailed judgement of today placed on file, we set aside the impugned orders and reinstate the appellant by converting major penalty of dismissal from service into minor penalty of stoppage of two annual increments and treat the intervening period as leave without pay. Costs shall follow the event. Consign.
- 3. Pronounced in open court at camp court swat and given under our hands and seal of the Tribunal on this 7th day of December, 2023.

MUHAMMAD AKBAR KHAN)

Member (E)
Camp Court Swat

(RASHIDA BANO) Member (J)

Camp Court Swat

05.07.2023

Learned counsel for the appellant present. Mian Niaz Gul, DSP (Legal) alongwith Mr. Muhammad Jan, District Attorney for the respondents present.

The availability of complete inquiry record before the Tribunal is necessary for just and right decision of the case, however the same has not been submitted by either party. Representative of the respondents is directed to produce complete inquiry record on the next date and to come up for arguments on 04.10.2023 before the D.B at Camp Court Swat. Parcha Peshi given to the parties.

Scanned KPST Poshewar

(Fareeht Paul)
Member (E)
Camp Court Swat

(Salah-ud-Din) Member (J) Camp Court Swat

Naeem Amin,

04.10.2023

Appellant in person present. Mian Niaz Gul, DSP (Legal) alongwith Mr. Muhammad Jan, District Attorney for the respondents present.

Appellant requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 07.12.2023before the D.B at Camp Court Swat. Parcha Peshi given to the parties.

DE ANNED

(Rashida Bano) Member (J) Camp Court Swat (Salah-ud-Din)
Member (J)
Camp Court Swat

Naecm Amin

03.05.2023

Father of the appellant present.

Fazal Shah Mohmand, Addl. Advocate General alongwith Niaz Muhammad, DSP (Legal) for the respondents present.

Former requested for adjournment on the ground that his learned counsel is not in attendance today. Granted. To come up for arguments on 07.06.2023 before the D.B at camp court, Swat. Parcha Peshi given to the parties.

SCANNED KPST Peshawar

(FAREEHA PAUL)
Member(E)
(Camp Court, Swat)

(ROZINA REHMAN)

Member (J)

(Camp Court, Swat)

Fazle Subhan P.S

- 7th June, 2023
- Learned counsel for the appellant present. Mr. Fazal Shah
 Mohmand, Additional Advocate General for respondents present.
- 2. Learned counsel for the appellant requested for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 05.07.2023 before D.B at Camp Court, Swat. P.P given to the parties.

SCANNED KPST Peshawar

(Muhammad Akbar Khan) Member (E) (Kalim Arshad Khan) Chairman Camp Court, Swat

*Mutazem Shah *

08.02.2023

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Today there is nobody present on behalf of the respondents nor submitted written reply/comments. The time provided in Rule-12 of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974 for filing reply is seven days before the date fixed but despite providing opportunity the respondents have not filed the comments. They are thus placed ex-parte and their right to file reply/comments stands struck off. To come up for arguments on 04.04.2023 before D.B at camp court Swat.

ecanned KPST Poshawar

(Muhammad Akbar Khan) Member Camp Court Swat

04th April, 2023 (Appellant in person present. Mr. Muhammad Jan, District Attorney for the respondents present.

Appellant seeks adjournment on the ground that his counsel has not turned up from Peshawar. To come up for arguments on 03.05.2023 before the D.B at Camp Court Swat. Parcha Peshi is given to the parties.

SCANNED KPST Peshawar

(Salah-ud-Din) Member (J) Camp Court Swat

(Kalim Arshad Khan)
Chairman
Camp Court Swat

FORM OF ORDER SHEET

Court of	y.F	
	3:0	·
Case No	1	167 💹 2022

		Case	No 167 ½2022	
	S.No.	Date of order proceedings	Order or other proceedings with signature of judge	
	1.	2	3	
	1-	25/11/2022	The appeal of Mr. Muhammad Ali presented tod	
Courts		was informed ically on	hearing before touring Single Bench at Swat on 3-1.	-
Idle	hon	1 (all 9 81)	Notices be issued to appellant and his counsel for the da	
	23/ CAN KEP	NED	fixed By the order of Chairman	-
_			REGISTRAR **	
		03.01.2023	Counsel for the appellant present.	
			Preliminary arguments heard. Record perused. Points raised need consideration. Instant	
Ą	ppellan Security	Deposited & Process Fee	appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit	
	-/1	CANNED KPST Poshawar	security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of	•
		Pesma	written reply/comments. To come up for written reply/comments on 08.02.2023 before S.B at camp court Swat.	

(Rozina Rehman)

Member (J)

(Camp Court Swat)

KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Respondents

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

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

Name:-_

Signature:

VHC Pet Composing Canter, 4t shawar High Court, Peshawar Honeer of legal drafting L. composing Cell Nov. +923028838600/+923119149544/+923159737151 id:- <u>เล็กเคลาสุดสมเล็</u>ตสมเล็ก

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 1675/2022

Peshawar

Muhammad Ali (Ex Constable No. 765) S/O Muhammad Nazir r/o Faizabad Saidu Sharif District Swat c/o S.P Elite Force Malakand Region Swat. Appellant

VERSUS

Provincial Police Officer Khyber Pukhtunkhwa Peshawar and Others. Respondents

INDEX

S.NO	Appeal/ Nature Of Documents	Annexure	Page
1.	Memo of service appeal		1-35
2.	Affidavit		હઉ
3	Copy of Fir dated 30-04-2022	A	7.8
4	Copy of Dismissal/ impugned order dated 26-10-2022	В	9-70
5	Copy of Departmental Appeal	С	N
6	Copy of rejection order date 10/11/2022	D	13
7.	Copy of acquittal order / judgment dated 25-10-2022	E	13-12
8.	Wakalat nama		16

Appellant

Through

HAMAD HUSSAIN

IRFAN ULLAH

Advocates

Peshawar high court

03120952763

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR



SERVICE APPEAL NO. 1675 /2022

Muhammad Ali (Ex Constable No. 765) S/O Muhammad Nazir r/o
Faizabad Saidu Sharif District Swat c/o S.P Elite Force Malakand Region
Swat.

Appellant Service Tribu

VERSUS

28/11/2022

1) Provincial Police Officer Khyber Pakhtunkhwa Peshawar.

- 2) The Additional Inspector General of Police, Elite Force /Commandant Elite Force Police Khyber Pakhtunkhwa Peshawar.
- 3) Deputy Commandant Elite Force Police Khyber Pakhtunkhwa Peshawar.
- 4) The Superintendent of Police Elite Force Malakand Region SwatRespondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER BEARING NO. 1423/REF DATED 26-10-2022 SUPERINTENDENT OF POLICE ELITE FORCE MALAKAND REGION SWAT, WHEREBY THE APPELLANT WAS DISMISSD FROM AND ORDER DATE 10/11/2022, WHEREBY THE DEPARTMENTAL APPEAL WAS ALSO REJECTED BY THE APPELLATE AUTHORITIES

PRAYERS:-

ledto-day ON ACCEPTANCE THE INSTANT SERVICE APPEAL, THE **IMPUGNED** ORDER DATED 26-10-2022 **ISSUED** SUPERINTENDENT OF POLICE **ELITE FORCE** MALAKAND REGION SWAT AS WELL AS ORDER DATE 10/11/2022 MAY KINDLY BE SET ASIDE AND APPELLANT MAY PLEASE BE RE-INSTATED INTO SERVICE WITH ALL CONSEQUENTIAL / BACK BENEFITS. THAT ANY

OTHER RELIEF NOT ASKED BY THE APPELLANT IF DEEMED FIT BY THIS SERVICE TRIBUNAL MAY ALSO BE GRANTED.

(D)

Impugned Transfer order date 26-10-2022

Departmental appeal date 31-10-2022.

Date of rejection of Departmental Appeal. 10-11-2022

RESPECTFULLY SHEWETH,

My humble submission are as under.

- 1. That the applicant namely Muhammad Ali No. 765 was serving as constable in the police department at under the Command of Superintendent of Police, Elite Force Malakand Region Swat and has rendered 8/9 years unblemished service recorded.
- 2. That on 30-04-2022 the appellant was charged in case vide F.I.R No. 308 u/s 324/34/337-F (iii) (vi)/337-A (iv) /15-AA PPC, Police Station Saidu Shareef Swat (Copy of Fir dated 30-04-2022 is attached as Annexure –A).
- 3. That after falsely charging in criminal the applicant surrendered himself to police and remained behind the bar / judicial lockup at in Swat Jail.
- 4. That after short time when the appellant was in judicial lockup at that time in the meanwhile the appellant was dismissed from service through the impugned order dated 26-10-2022 by the Superintendent of Police, Elite Force Malakand Region Swat i.e. Respondent No.4 (Copy of Dismissal/ impugned order dated 26-10-2022 is attached as Annexure-B).
- 5. That on 31-10-2022 the appellant has filed a departmental appeal to Respondent No. 3the Deputy Commandant of Police, Elite Force Khyber Pakhtunkhwa against the impugned / dismissal order dated 26-10-2022

- issued by Respondent No. 2 Superintendent of Police, Elite Force Malakand Region Swat (Copy of Departmental Appeal dated 31/10/2022 is attached as Annexure-C)
- 6. That departmental appeal filed the appellant was rejected by the Additional Inspector General of Police Elite Force, Khyber Pakhtunkhwa Peshawar vide its order No. 13132-38/EF dated 10-11-2022 (Copy of rejection order dated 10/11/2022 upon departmental appeal by Additional Inspector General of Police Elite Force, Khyber Pakhtunkhwa Peshawar is attached as Annexure-D)
- 7. That feeling aggrieved from the respondent's rejection order on departmental appeal the appellant approach this Honourable Tribunal with the following grounds.

GROUNDS:-

- A. That the appellant has not been convicted by court of law in criminal case and court proceedings against the applicant was pending at the time of departmental proceeding against the appellant in the court of Additional District and Session judge –VI Swat and after conducting trial the appellant was acquitted from the charges though an order/judgment dated 25-10-2011 (Copy of acquittal order / judgment dated 25-10-2022 is attached as Annexure-E).
- B. That no regular inquiry has been conducted against the appellant nor the inquiry officer summoned the accused appellant from judicial lockup to record statement of appellant nether the appellant was personally heard during the inquiry proceeding thus whole proceeding is illegal, unlawful against the law and rules, void -initio, hence dismissal order dated 26-10-2022 of the appellant is liable to be set aside.



- C. That the inquiry officer proceeded an illegal inquiry against the appellant wherein the department was in knowledge about the appellant who was in judicial lockup at central prison Swat, while the department could not communicated charge sheet / statements of allegation and show cause notice to the appellant at central prison Swat neither the inquiry officer visited central prison to record statement of the applicant behind the judicial lock up nor an opportunity of cross examination was provided to the appellant and one sided / ex- party departmental proceedings initiated against the appellant t which is against the law, rules, judgment of the superior courts and also against the norms of natural justice.
 - D. That no opportunity of personal hearing was afforded to appellant, which is also the mandatory requirement of law and rules. The applicant was condemned unheard and accordingly the dismissal order dated 26-10-2022 is void, ab-initio, arbitrary, hence not sustainable.
 - E. That the right of fair trial is granted by Article 10 A of the constitution of Islamic republic of Pakistan 1973 but the same cannot provided to the appellant, furthermore there is no evidence against the appellant.
 - F. That codal formalities regarding dismissal of the applicant has not been followed by the department in accordance with Law and Rules, while in case the appellant was in judicial lockup and behind the bar which are against the norms of natural justice.
 - G. That according to law and rules as well as averments of judgments of the superior courts the department cannot dismissed the applicant from service, while the department can suspend the applicant if the court of law has not been declared the appellant as convict and during the period behind the bar/judicial lockup on suspension the appellant is entitled to pay monthly salary till conviction from the court of law in

this regard the applicant rely upon judgment of the Superior Court reported as 2019 PLC (CS) 255.

H. That the department committed illegality and irregularity referred to FR 54 and CSR 194-which read as:

"CSR 194-A: A Government Servant who has been charged for a criminal offence or debt and is committed to prison shall be considered as under suspension from the date of his arrest. In case such a Government Servant is not arrested or is released on bail, the competent authority may suspend him, by specific order, if the charge against him is connected with his position as Government Servant or is likely to embarrass him in the discharge of his duties or involve moral turpitude. During suspension period the Government servant shall be entitled to the subsistence grant as admissible under FR 53."

It is, therefore, most humbly requested that on acceptance of the instant appeal the appellant may kindly be re-instated in his service in the light of various judgments of the superior Courts as well as Honourable Tribunal mentioned above with all back benefits.

Any others relief the appellant which mat not asked by the appellant from this Honourable Tribunal if deemed fit may also be granted.

Through

HAMAD HUSSAIN

IRFAN ULLAH
Advocates
Peshawar high court
03120952763

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR



<u>SERVICE APPEAL NO.</u>/2022

Muhammad Ali (Ex Constable No. 765) S/O Muhammad Nazir r/o
Faizabad Saidu Sharif District Swat c/o S.P Elite Force Malakand Region
Swat.
Appellant

VERSUS

Provincial Police Officer Khyber Pukhtunkhwa Peshawar and Others. Respondents

AFFIDAVIT

Muhammad Ali (Ex Constable No. 765) S/O Muhammad Nazir r/o Faizabad Saidu Sharif District Swat c/o S.P Elite Force Malakand Region Swat do hereby solemnly affirm and declare that contents of the accompanying Service Appeal is true, correct to best of my knowledge and nothing has been concealed from this Honourable Tribunal.

Deponent

Through

HAMAD HUSSAIN

IRFAN ULLAH
Advocates
Peshawar high court
03120952763

"ابتدائی اطلاعی رپورٹ

سلع سوات

قانه سیدوش*ر*لف

تاريخ ووت وقت 25.02 وقت 25.02

308 1 = 4

2/40 تقع 30-4-22 مرام دور فر عرام 30-04-22	تاریخ وقت ر پورٹ ۔	1	
علیرونی ولدیت مل طب فان	نام ستغيث إ	2	
324/34,337 AOV) 337 F	مخقر کیفت جرم (معدد فعه)	+	
نزد بلال سيد واقع خان مالوني منفي آيا د مفاصله Km بالمنازب	المرابع المرابع	77	1
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سرسر في مراسل مفرح هذا عالم لرياني	كاروائي جريفتيش كمتعلق كي لئي	6] .
برسیل درگ	تھانہ۔روا گی کی تاریخ وتت۔	7	

ابتدائى اطلاع بنيج درج كرو: - اس وتت ركي التريين مراسله منيائ العدنتاران ا ١٤ ا يُحَارِج كَيْجِولْمُ سِيدُوسْرِسِتْ مِنْ بِرِسْتُ لِنَدْلُ عَامِرِسِيلُ ٢٥٥٥ مُوصُولُ بِمُولِر وْ بِلَ بِنِي . كُرْسْتُ أَنْسِر انجارج تعانىسى وستريف دودان و لونى كجدلى بسيال سيرو سريف مين دوجود ثعا ، به فروهين تحيدرولى دلد قل طب فان @ نا در فان ولا براً عان @ صات ولد نظفر فان في آفتاب ولد فير لوسف @ عُرِان ولد نا درفان @ صابر فان ولد دلاور هان سائنان فان فالونى منص آباد كالد في وست ہدتال کیجولٹی لائر فجرد استین بالا کا حوش رعوامی صدی لائے ڈائٹری درست سے ۔ لول ربورت الركابي كم أم سن من من عنه بعنا أم نادر مان مال غاز عناء ادا كرف كالع بازال سيما ما ربي تق مرب لوقت بمقاع مال بيني لمق منا م بدل سي تحقيق و د سيان فيرعلى ولافرنبرير ا ور الله اور ستحف السم سكن فا معلم حسكو سا من آن لير شنافت كر سكنا بيون . علي و ملعق بيون مسأن بالاند بهم المر أنس عد الراده قبل الدهاد للله فالمرتب الروع فرا حسود عائرنگ سے میں دائش فاؤں کے عید پر بھی آئ فادرفان مال بستھ کردن اسامنے مائیں طرف چیر کے بیر کر اور میں میان مال کے فائرنگ سے دیگر راوگیر فیروسی سریل کای سان کا بستی دید ہے ، و ب ساد ان کا در خان کالا بر بر ادادہ قتل بزرائے اسلی ریشن ملے کا برنگ مربط اور رقعی کرنے اور دیگر رابعگیروں کو زختی کرنے کا برفارات ملزوان فی ملی ولا (15602-6045497-9) is de sto con sol is de sto con sol is 602-6045497-9 شت کی . عبی افکری تی . بحروان مالا کر لغرف مارا کے مرت امریک صورالم اورون لؤرزان مال کی عفون کی معلون کے معلون ربوری سے جم مالا یا کی عائم بر فلاف علزوان مرسلم بیخری بالاطبط کر بیر سے اور بر ست سنگ عامر مہلک

prince of



Office of the Superintendent of Police, Ellie Force, Maintaind Region, Swat



Dated 26 1 60 1901

No. 1423 /R, EF

ORDEB

This order will dispuse of the departmental proceeding against Constable Muhammad Ali No.765 of Ellite Force platoon No.55 District Swat.

As per information report of District Commander Pille Porce Swat, he has been charged in case PIR No.308, dated 30-04-2022 U/S 324/34 PPC Police Station Builds Sharll, and also remained absent from law full duty without any leave or prior permboton from the competent nutbody wer from 29-04-2022 till to date.

In this regard, he was suspended and charge sheet along with Summary of Allegation were issued to him by Deputy Commandant Elite Force vide No.4492 98/EP dated; 09 05 2077 and Mr. Fahad Khan, Acting DSP Elite Force Malakand Region was appointed as angulty officer. The enquiry officer conducted enquiry proceedings and submitted like findings report that the said constable is found guilty for remaining absent from 29-04-2022 till to date and neglecting attendance in the platoon and also for not giving any satisfactory reason about involvement in case 1/11/146, 108, dated 30-04-2022 U/S 324/34 PPC Police Station Salda Sharlf. Similarly Fluid Show case Notice was issued to him vide No.1295/R,EF dated: 09-08-2022, which was deliver to him at has resident address? District Jail Swat) through reader District Commander Elite Force Swat, be submitted reply of FSM but his reply was found again the same (unsatisfied). It seems that he has no interest in his current job.

Therefore, I, Asad Zubair, Superintendent of Police Elite Force Malakand Region as competent authority, keeping in view the above facin and exemustances, impose major penulty of "DISMISSAL" from service upon him from the date of absence i.e. 29-04-2022 under Police Rules 1975 (Amended 2014).

Order Announced!

(ASAD ZUBAIR)

Superintendent of Police, Elite Force Mainkand Region, Swat.

Copy of above is forwarded to the:-

- 1. Deputy Commandant Elite Porce Khyber Pakhtunkhwa Peshawar.
- 2. District Police Officer Swat, for Information.
- 3. SP HOrs Elite Force Peshawar.
- 4. District Commander Elite Force Swat, for Information.
- 5. Accountant Elite Porce Khyber Pakhtunkhwa, Peshawar,
- 6. OASI/ I/C Kot Elite Force Khyber Pakhtunkhwa Peshawar.
- 7. EC/SRC Elite Force Khyber Pakhtunkhwa Peshawar,
- 8. FMC Elite Force along with departmental enquiry file Enls: (43 pages) No.1246/R dated 06-07-2022.

Better Copy



Office of the superintendent of Police Elite Force, Malakand Region, swat

No.1423/R, EF

date 26/10/2022

ORDER

This order will disposed of the departmental preceding against Constable Muhammad Ali No.765 of elite Force Platoon No. 55 district swat.

As per information report of District Commander elite Force swat, he has been charged in case FIR No 308 dated 30/04/2022U/S 324//34 PPC police station saido sharif , and also remained absent from law full duty without any leave or prior permission from the competent authorise w.e from 26/04/2022 toll to date .

In this regard, he was suspended and charge sheet along with summary of allegation were issued to him by deputy commanded elite force Vide No 4492/98/EF date 09/05/02022 and Mr fahad khan, acting DSP Elite Force Malakand Region was appointed as enquiry officer, the enquiry office conducted the enquiry proceeding and submitted his finding report that the said constable is found guilty for remaining absent from 29/04/2022 till to date and neglecting attendance, and the platoon and also for not given any satisfactory reason about involvement in case FOR 308 dated 30/04/20222 U/S 324/34 PPC police station Saido Sharif , similarly final show cause notce was issued to him No 1295/R, EF dated 09/08/02022, was which was deliver to him at has resident (District Jail swat) through radar District Commander Elite Force swat , he submitted Reply of FSN but his reply was found again the same (Un satisfied) if seems that he has no interest in his current job.

Therefore I, Asid Zubair superintendent of police Elite Force Malakand Region as competent authority / keeping in view the above facts and circumstances, imposed major Patently of (DISSMISSAL) from service upon him from the dated od absence i.e 29/04/2022 under police rule 1975 (amended 2014)

Order Announced

(ASID ZUBAIR)

Superintendent of police Elite Malakand Region swat

Copy of above is Forwarded to the:

- 1. Deputy Commanded Elite Force KPK, Peshawar
- 2. District Police officer swat, for information.
- 3. SP HQrs Elite Force Peshawar
- 4. District Commander Elite Force Swat for information.
- 5. Accountant Elite Force KPK Peshawar.
- 6. OASI/I/C kot Elite Force KPK, Peshawar.

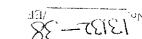
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<u>ORDER</u>

Office of the Addi: ICP, Elite Force Khyber Pakhtunkhwa Peshawar

This order will dispose of the appeal submitted by Ex-Const: Muhammad Ali No. 765 against his major punishment of dismissal from service awarded to him by SP Elite Force Malakand Region vide No. 1423/R, EF, dated 26,10,2022.

Brich facts of the case are that:

As per information report of District Commander Elite Force Swat. He has charged in case, FIR No. 308, dated 30.04,2022 11/S 324/34, PPC Police Station Saidu Sharif district Swat and also remained absent from lawful duty without any leave or prior permission w.c. rom and also remained absent from lawful duty without any leave or prior permission w.c. rom

Subsequently, he was suspended and closed to Elite HQrs Pechawar vide No. A484-91/EF, dated 09.05.2022 and Charge Sheet alongwith Summary of Allegations were issued to him vide No. 4492-98/EF, dated 09.05.2022 and the then Acting DSP/Elite Force. Malakand region was nominated as enquiry officer and after going through all the proceedings the enquiry officer found him guilty for remaining absent w.e.f. 29.04.202022 and neglecting attendance in platoon and also not for giving any satisfactory reason about his involvement in the said case. Similarly, he was not for giving any satisfactory reason about his involvement in the said case. Similarly, he was found and also not for giving any satisfactory reason about his involvement in the said case. Similarly, he was found and also not for giving any satisfactory reason about his involvement in the said case. Similarly, he was found and the recommendation of enquiry, officer imposed major punishment of dismissal from service under Police Rules 1975 (Amended 2014).

Now, he has preferred the instant appeal before the undersigned for re-instatement

jnto service.

The undersigned being competent authority keeping in views the situation and circumstances of the case called him in OR, but he could not offer any cogent reason in support of his absence and he was acquitted from court on the basis of compromise. Being an ill-disciplined official his appeal is hereby rejected, with immediate effect.

Отдег авиониссед:

(MUHAMMAD WISAL FAKATAR SULTAN)PSP
Addl: Inspector Concret of Police
Fitte Force Khyber Pakhtunkhwa Peshawar

TINE

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

Superintendent of Police, Elite Force Malakand Region.

3. EC/S.R.C/OASL Elite Force Khyber Pakhtunkhwa Peshawar.

5. Ex-FC Muhammad Ali No. 765, through Reader SP Bite Force Malakand.

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﴿ اندُكس ﴾

بتدالت راحت الله جج ما وُل كريمينل ٹرائل كورٹ انجي پيشل كورٹ ايديشنل سيشن جج ششم سوات	ایڈیشنل میشن جج ششم سوات	ائل كورث الجيشيش كورث ا	بعدالت راحت الله جج ماذل كريمينل فر
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(CERTIFICATE)

Certified that Case in hand Bearing No and Date mentioned above has been properly

Classified in Part "A" Containing 79 Pages & Part "B" Containing 400 Pages as per

High Court Rules & Orders.

Name of Muharrir:

Designation: Junior Clerk

Court: Rahat Wah Judge MCTC/CBV/Special Court / ASJ-VI Swat

Countersigned

Additional Sessions Judge Vizal: Zilia Qazi-VI Swai MCTC. GBV

ATTICITED



IN THE COURT OF RAHATULLAH

ADDITIONAL SESSIONS JUDGE/IZAFI ZILLA QAZI-VI, SWAT

Sessions Case No. 119/7 of 2022, "The State Vs Muhammad Ali"

Order No.03 25.10.2022

Mr. Mujeeb-ur-Rehman, learned APP for the State, present. Accused Muhammad Ali, booked in instant case FIR No. 308 dated 30.04.2022 U/S 324/34/337-F(iii)(vi)/337-A(iv)/15AA PPC of P.S Saidu Sharif, produced in custody from jail. Complainant/injured namely Haidar Ali along with injured namely Nadar Khan S/o Behram, Hayat Khan S/o Muzafar Khan, Aftab S/o Muhammad Yousaf and Imran S/o Nadar Khan present, who at the very outset, stated at the Bar that they have effected compromise with the accused Muhammad Ali and have pardoned him in the name of Almighty Allah, therefore, they have got no objection if the accused is acquitted in the instant case. To this effect, their joint statement recorded. Copies of CNICs of Nadar Khan, Hayat Khan, Aftab Hussain, Imran, Sabir Khan and Haidar Ali are

Since, all the offences, except offence u/s 15AA PPC, are compoundable, therefore, the accused Muhammad Ali is hereby acquitted from charge u/s 324/34/337-F(iii)(vi)/337-A(iv) PPC on the basis of compromise.

Ex.PA to Ex.PF respectively.

As far as section 15AA is concerned, record transpired that one 30 bore pistol has been recovered on pointation of

Manufacture Manufa

ATTESTED

<u>Sessions Case No. 119/7 of 2022,</u> <u>"The State Vs Muhammad Ali"</u>



Order No. 03
25.10.2022
(continued)

accused Muhammad Ali on 18.06.2022 while eight crime empties of 30 bore were recovered from the place of occurrence vide recovery memo dated 30.04.2022. Accused Muhammad Ali along with one unknown co-accused have been charged in the FIR, however, when the crime empties were sent to FSL, its report revealed that seven crime empties were fired from different 30 bore weapons while one crime empty is that of 9mm bore. The recovered pistol has not been sent to FSL for matching with the crime empties, hence, in the absence of such FSL report it cannot be determined that the pistol so recovered was the weapon used in the offence or not. For above, there is no probability of conviction of the accused Muhammad Ali u/s 15AA, therefore, he is acquitted u/s 265-K Cr.P.C from the charge u/s 15AA.

The accused Muhammad Ali is in jail, therefore, he be released forthwith, if not required in any other case/crime.

Case property be dealt with in accordance with law after expiry of the period for appeal/revision.

File be consigned to record room after necessary completion

and compilation.

Announced 25.10.2022

(Rahatullah)

Addl: Sessions Judge/IZQ-VI,

Swat

Additional Sessions Judgel

18050. G8V

Page 2 of 2



SCANNED %/ST Peshawar

وكالتام

		1, 2
1	مر میرور <u>نس</u> ے۔ تارن	<i>fu</i> :
م. تحسرير آنک		

حاد حسين ايدوكيد ماني كورث يشاور استر عرفان الرس ريزدر س

کویہ ہیں شرط بھی مقرر کیاہے کہ میں ہر پیٹی پر خود یا بزریعہ مختیار خاص رو بروئے عدالت ماضر ہوتار ہو نگارہ ہو نگا اور بوقت پکارے جانے مقد مسہ موصوف صدر مقام کی ہر سام کے کمی طور میرے کہ علام مقدمہ میری غیر حاضری کی وجہ سے کمی طور میرے برخان ہو گیا تو حالت موصوف صدر مقام کیجر سے کئی اور جگہ ساعت ہونے یا بروز تعطیل یا کچری کے کمی اور جگہ ساعت ہونے یا بروز تعطیل یا کچری کے کمی اور جگہ ساعت ہونے یا بروز تعطیل یا کچری کے کا اور جگہ ساعت ہونے یا بروز تعطیل یا کچری کے اوقات کے آگے پیچھے پیش ہونے برمی میشری کو گوئی انتصال بیچے والی کے نور اوقات کے آگے پیچھے پیش ہونے برمی میشری کو گوئی انتصال بیچے والی کے در در اور ایس کے دوسط کی معاوضہ کے اور اگر نے باختیار نامہ والی کرنے کے مجمی صاحب موصوف و در خواست اجرائے وگری کو گوئی انتصال بیچے والی کہ میں موصوف کو عرضی وعوالی وجواب دعوی اور در خواست اجرائے وگری و نظر عالی ایس و گری گیا در خواست اجرائے وگری و نظر عالی ایس و گری اور سیدو ہے اور کسی موصوف کو عرضی وعوالی وجواب دعوی اور در خواست اجرائے وگری و نظر عالی ایس و گری اور سیدو ہے اور کسی و نظر اور کی اس کے در خواست اجرائے وگری و نظر علی اور پر مشم کی در خواست اجرائے وگری و نظر علی اور پر در خواست اجرائے والے مقدر اور میں موسوف کو بھی اختیار نامہ کو فیصل کرنے اور بر مشم کی بیان و بیائی اور بہا اور کسی و نظر ان اور ایس کی اختیار نامہ کی وہوں اور ایسی موسوف کو بھی اختیار نامہ کی وہوں اور ایسی موسوف کو بھی اختیار نامہ کی وہوں اور ایسی وہی اور ایسی یا اختیار اور کی کی در خواست موسوف کو بھی اختیار نامہ کی وہوں اختیار کو جمام میں وہ در کری اور ایسی میں اختیار نامہ کور در بات کہ مقدمہ کی پردی نہ کریں اور ایسی میں اختیار نامہ موسوف کو بھی اختیار نامہ کی وہوں اختیار نامہ کور در ان کی در خواست موسوف کو بر خلاف نہیں وہ گا۔ اندا میر میں اور ایسی طروحت کی بردی کی موسوف کو بھی اختیار نامہ کی در خواست کی بردی کی موسوف کو بھی انتیار نامہ کی در خواسوس کی بردی کی در خواست کی بردی کی موسوف کو بھی اختیار نامہ میں دور سے در کی کا صوف کے برخواف نمیں کی در خواس کی

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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR. JUDICIAL COMPLEX (OLD), KHYBER ROAD,

	FESHAWAR.
No.	$\overline{\text{TB}}$
	Appeal No. 1675 of 2022
	M. Al. Appellant/Petitioner
	Versus P.P.O. KPK P2Sh: Respondent
	P.F.O. IXPIX 12Sh. Respondent
	Respondent No. 1
Notice to: —	P.P.O 12P12 Pesh:
the above cashereby infor hereby infor son	EAS an appeal/petition under the provision of the Khyber Pakhtunkhwa rvice Tribunal Act, 1974, has been presented/registered for consideration, in se by the petitioner in this Court and notice has been ordered to issue. You are med that the said appeal/petition is fixed for hearing before the Tribunal and the said appeal/petition is fixed for hearing before the Tribunal and the said appeal/petition is fixed for hearing before the Tribunal and the said appeal petition on the date fixed, or any other day to which the postponed either in person or by authorised representative or by any ly supported by your power of Attorney. You are, therefore, required to file in a least seven days before the date of hearing 4 copies of written statement by other documents upon which you rely. Please also take notice that in our appearance on the date fixed and in the manner aforementioned, the on will be heard and decided in your absence. of any alteration in the date fixed for hearing of this appeal/petition will be by registered post. You should inform the Registrar of any change in your ufail to furnish such address your address contained in this notice which the in the appeal/petition will be deemed to be your correct address, and further to this address by registered post will be deemed sufficient for the purpose of the etition.
Copy o	f appeal is attached. Copy of appeal has already been sent to you vide this
office Notice	Nodated
	under my hand and the seal of this Court, at Peshawar this
Day of	J_{av} 2023.
À	4 Camp Court Swat Registrar, Khyber Pakhtunkhwa Service Tribunal.

The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays. Always quote Case No. While making any correspondence.

Peshawar.

Service Websenst
Dinry No 5046

SCANNED KPST Poshawar

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

In Re:

Service Appeal No. 1675/2022

Muhammad Ali

.....Appellant

Versus

Provincial Police Officer, KPK Peshawar

..... Respondents

INDEX

S.No	Description of Documents	Annex	Pages
1.	Written Reply	<u> </u>	1-4
2.	Affidavit		5
3	Copy of Authority letter		6
4.	Copies of Charge Sheet with Summary Allegation	A	7-8
5.	Copy of Enquiry Report	В	9-11
6.	Copy of Reply of appellant	С	. 12
7.	Copy of dismissal order	D	13

ADSP Legal MianNiazMuhamad,

Elite Force, Peshawar

PESHAWAR

In Re:	·
Service Appeal No. 1675/2022	
Muhammad Ali	Appellant
	Versus
Provincial Police Officer, KPK	Peshawar Respondents
PARAWISE COMMENTS OF	BEHALF OF RESPONDENT NO. 01,02, 03 & 04.
Respectfully Sheweth:	
PRELIMINARY OBJECTIONS:	<u>.</u>

- - 1. That the appeal is not based on facts.
 - 2. That the appeal is barred by law and limitation.
 - 3. That the appeal is not maintainable in its present form.
 - 4. That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
 - 5. That the appellant is estopped to the file the instant appeal by his own conduct.
 - 6. That the appellant has come to this Hon'ble Tribunal with unclean hands.
 - 7. That the appellant has got no cause of action and locus standi to file the instant service appeal.

ON FACTS:

- 1. Pertains to record.
- 2. Correct to the extent that appellant was charged in FIR NO. 308, he was also remained absent from lawful duty without any leave or prior permission from the competent authority with effect from 26.04.2022 till to 28.10.2022. In this regard he was issued charge sheet with the summary of allegation, moreover Mr. Fahad

Khan, DSP Elite Malakand was appointed as enquiry Officer to dig out the real facts of the case after fulfilling of all codal formalities the appellant was found guilty in Enquiry for remaining absent from 29.04.2022 till to date 26.10.2022 i.e. (6 Months) and also for not given any satisfactory reason about involvement in case FIR No 308 Under Section 324/34 PPC, however final show cause notice was also issued to him, he submitted reply but his reply was not found satisfactory, hence dismissed from service. (Copies of Charge Sheet with Summary Allegation is Annexure A, copy of Enquiry Report is Annexure B, Reply of appellant is Annexure C, while copy of dismissal order is Annexure D).

- 3. Correct, as already explained in para No. 2.The applicant was surrender himself on 17.06.2022 to PS Saidu Sharif Swat.
- 4. Correct, as already explained in the preceding paras but departmental enquiry and judicial trial are two separate entities which can run parallel without effecting each other.
- 5. Correct, the appellant filed departmental appeal on 31.10.2022 Diary No. 8421, but the same was devoid of law and merit hence rejected vide No.8421dated 07.11.2022.
- 6. Correct, however, appellant was heard in orderly room but he could not offer any cogent reason in support of his absence and also involved in criminal case being in-disciplined official his appeal was dismissed.
- 7. Incorrect. The appellant has got no cause of the appeal, therefore, the instant appeal may kindly be dismissed on the following ground:

ON GROUNDS:

- a. Ground A is correct to the extent that appellant was acquitted in the Court of Law. Correct to the extent of acquittal of the appellant vide judgment dated 25.10.2011 of District Session Judge Swat. However, departmental enquiry and judicial trial are two different entities, can run parallel to each without affecting each other.
- b. Incorrect, regular departmental enquiry was conducted against the appellant.

 Correct to the extent that appellant was charged in FIR NO. 308, he was also

3

remained absent from lawful duty without any leave or prior permission from the competent authority with effect from 2604.2022 till to 28.10.2022. In this regard he was issued charge sheet with the summary of allegation, moreover Mr. Fahad Khan, DSP Elite Malakand was appointed as enquiry Officer to dig out the real facts of the case after conducting of all codal formalities the appellant found guilty in Enquiry for remaining absent from 29.04.2022 till to date i.e. (6 Months) and also for not given any satisfactory reason about involvement in case FIR No 308 Under Section 324/34 PPC, however final show cause notice was also issued to him, he submitted reply but his reply was not found satisfactory, hence dismissed from service. (Copies of Charge Sheet with Summary Allegation is Annexure A, copy of Enquiry Report is Annexure B, Reply of appellant is Annexure C, while copy of dismissal order is Annexure D).

- c. Incorrect, as already explained in preceding paras.
- d. Incorrect, as already explained in preceding paras.
- e. Incorrect, appellant was dealt according to law, rules and regulations.
- f. Incorrect, no discrimination has done with the appellant, after fulfillment of all codal formalities appellant was dismissed.
- g. Incorrect, as already explained in preceding paras.
- h. Incorrect, appellant has dealt according to the constitution, rules and regulations, moreover, respondents may be allowed to raise other grounds at the time of arguments.

PRAYER:

Keeping in view of the above stated facts, it is humbly prayed that the service appeal is based on fallacious grounds may kindly be dismissed with cost please.

Superintendent of Police = Elite Force, Malakand Region, Swat (Respondent No. 4) Deputy Commandant, Elite Force, Klayber Pakhtunkhwa, Peshawar (Respondent No. 3)

Addl: Inspector General of Police Elite Force, Khyber Pakhtunkhwa, Peshawar (Respondent No. 2) Inspector General of Police, Khyber Pakhtunklawa, Peshawar (Respondent No. 1)

5

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL , <u>PESHAWAR</u>

In Re:

Service Appeal No. 1675/2022

Muhammad Ali

.Appellant

Versus

Provincial Police Officer, KPK Peshawar

..... Respondents

AFFIDAVIT

I Mian Niaz Muhammad (ADSP Legal) Elite Force, Khyber Pakhtunkhwa Peshawar, do hereby solemnly affirm that the contents of this Written Reply on behalf of respondents are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

- DEPONENT

CNIC: 17301-1519386-1

Identified by:

Cell # 0300-5899631

AUTHORITY LETTER

I the undersigned do hereby authorized Mr. Mian Niaz Muhammad Inspector/ADsp Legal to submit the replies and attend the Honorable High Court on behalf of respondents.

Elite Force, Knyber Pakhtunkhwa,

Peshawar.

M

ANKR (A)

CHARGE SHEET

I, Asif Iqbal Mohmand, Deputy Commandant Elite Force Khyber Pakhtunkhwa Peshawar as competent authority, hereby charge you Constable Muhammad Ali No. 765, Platoon No. 55 of Elite Force as follows;

You have been charged in case FIR No. 308, dated 30.04.2022 U/S 324/34 PPC Police Station Saidu Sharif District Swat and also remained absent from lawful duty without any leave or prior permission from the Competent authority w.e.from 29.04.2022 till to date, as per information report of District Commander Elite Force Swat vide letter No. 1127/R, EF, dated 30.04.2022 of A/DSP EF MKD. Being a member of discipline force, your this act amounts to gross misconduct on your part.

- By reason of the above, you appear to be guilty of misconduct under the Khyber Pakhtunkhwa Police Rules, 1975 (Amendment 2014) and have rendered yourself liable to all or any of the penalties specified in the said rules.
- 3. You are therefore, directed to submit your defense within Seven days of the receipt of this Charge Sheet to the Enquiry Officer.
- 4 Your written defense, if any, should reach the Enquiry Officer within the specified period, failing which, it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.
- 5 You are directed to intimate whether you desire to be heard in person.
- 6 A statement of allegation is enclosed.

(ASIF IQBAL MOHMAND)PSP

Deputy Commandant
Elite Force Khyber Pakhtunkhwa
Peshawar

Mac

Mobile=0342-4337589

Date =

Luxi Hy

SUMMARY OF ALLEGATIONS

I, Asif Iqbal Mohmand, Deputy Commandant Elite Force Khyber Pakhtunkhwa Peshawar as competent authority, am of the opinion that Constable Muhammad Ali No. 765 Platoon No. 55 of Elite Force has rendered himself liable to be proceeded against as he has committed the following misconduct within the meaning of Khyber Pakhtunkhwa Police Rules, 1975 (Amendment 2014).

SUMMARY OF ALLEGATIONS

He has been charged in case FIR No. 308, dated 30.04.2022 U/S 324/34 PPC Police Station Saidu Sharif District Swat and also remained absent from lawful duty without any leave or prior permission from the Competent authority w.e.from 29.04.2022 till to date, as per information report of District Commander Elite Force Swat vide letter No. 1127/R, EF, dated 30.04.2022 of A/DSP EF MKD. Being a member of discipline force, his this act amounts to gross raisconduct on his part.

- 2. For the purpose of scrutinizing an enquiry is conducted of the said accused with reference to the above allegations, Mr. Fahad Khan Acting DSP Elite Force Malakand Region is appointed as Enquiry Officer.
- 3. The Enquiry Officer shall provide reasonable opportunity of hearing to the accuse 1, record statements etc and findings within (25 days) after the receipt of this order.
- 4. The accused shall join the proceedings on the date, time, and place fixed by the Enquiry Officer.

(ASIF IQBAL MOHMAND)PSP

Deputy Commandant
Elite Force Khyber Pakhtunkhwa
Peshawar

No. 492 - 8 /EF, dated Peshawar the 0? /05 /2022.

Copy of the above is forwarded to the:-

- 1. Acting Deputy Superintendent of Police, Elite Force Malakand Region.
- 2. Accountant, Elite Force Khyber Pakhtunkhwa Peshawar to stopped his pay.
- 3. Reader to Deputy Commandant, Elite Force Khyber Pakhtunkhwa Peshawar.
- 4. SRC/FMC, Elite Force Khyber Pakhtunkhwa Peshawar.
- 5. FC Muhammad Ali No. 765, of Elite through reader A/DSP Elite Malakand.

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آئن آف سير مثندُ شُ آف په لهس ايليٹ فورس مالاکندر يَجَلَي سوات نينون نبر: 755331-0946



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فلينزئك رلادك

الله بهاي

بوالہ مشمولہ چارج شیٹ نمبری 98/EF محررہ 2022-05-09 معروض خدمت ہوں۔ کہ وفتر جناب ڈپٹی کانڈ نٹ صاحب ایلیٹ فورس خیبر پختو نخواہ پٹاور ، سے چارج شیٹ متذکرہ بذریعہ ڈاک موصول ہوکر طاحظہ کرنے پر پایا گیا کہ کانڈ نٹ صاحب ایلیٹ فورس خیبر پختو نخواہ پٹاور ، سے چارج شیٹ متذکرہ بذریعہ ڈاک موصول ہوکر طاحظہ کرنے پر پایا گیا گیا گئی معروض مور خد 2022-04-04 ورجہ مورخ پر کیس FIR کمبر 308مور خد 2022-04-04 ورجہ مورخ پر ماضر منامز د ہوئے اور مورخہ 2022-04-29 سے بحوالہ مد 18 تا مال ڈاو ٹی سے غیر صاضر بہتے کا الزام لگایا گیا ہے۔ اور من زیر د سخطی کو انگوائری آفیسر مقرر کیا گیا ہے۔

اندریں بارہ من زیر و شخطی نے حسب ضابطہ انکوائری شروع کر کے ، SI سلیم خان انچارج پلاٹون نمیر 55 کا بیان قلمبند
کیاجا کر مقامی باشدول مسیان طارق ولد محمہ سلیم، عرفان اللہ ولد نور محمہ سکنہ فیض آباد سیدوشریف سے کنسٹیبل فد کور کے
دولیدش کے بارے میں تصدیق کرکے تفتیش آفیسر سے پراگرس رپورٹ، وارنٹ گرفٹاری زیروفعہ 204 ض ف، اشتہار زیر
فیہ 87 ض فیہ اور مشل متحد مد کے نقولات حاصل کر کے ہمرالف انکوائری ابذا ہوئے ۔ مذکورہ نے مور ند -17-06
وفیہ 87 فی فیہ اور مشل متحد مد کے نقولات حاصل کر کے ہمرالف انکوائری ابذا ہوئے ۔ مذکورہ نے مور ند -17-06
وفیہ 70 فی فیہ اور مشل متحد مد النہ مجاز نے جوڈیشل حوالات ڈسٹر کٹ جیل سیدوشریف سوایت جیجو ایا ہے ۔ نہ کورہ پر ڈسٹر کٹ جیل سیدوشریف سوایت جیجو ایا ہے ۔ نہ کورہ پر ڈسٹر کٹ جیل سیدوشریف سوایت جیل سیدوشریف سوایت جاکر میں مقدمہ کے نقولات ہمرالف ہیں)
مذکورہ کا بہان تلمبند کیا گیا۔ (جملہ عاصل کر دوبیانات ، نظامدات ، مشل مقدمہ کے نقولات ہمرالف ہیں)

کنسٹیسبل جھے علی نمبر 765 پلاٹون نمبر 55 نے اپنے بیان میں FIRس اپنے خلاف لگائے گئے الزامات مستر دکرتے ہوئے واضح کیا کہ بروز و توعہ نہ کورہ اپنے جائے تعیمناتی تھانہ الروڑے بغیر اجازت گھر خود آتا ہوا بمقام گرین چوک مینگورہ بازار جائے و توجہ نے واضح کیا کہ بروز و توجہ کے گھر سے اطلاع موصول ہوئی کہ دیم ہواش کے لوگوں مسیان نادر خان ولد بہرام خان اور حیات خان وغیرہ نے ایک دوسرے پر اسلحہ آتشیں اور پہتو تول سے اندھاد ھند کے لوگوں مسیان نادر خان ولد بہرام خان اور حیات خان وغیرہ نے ایک دوسرے پر اسلحہ آتشیں اور پہتو تول سے اندھاد ھند فائر نگ کی ہے۔ جس میں سے نادر خان و غیرہ واس کے خلاف و عوید اری کرنا چاہئے ہے۔ آپ جہاں بھی ہے اپنا خیال رسمیں اور گھر خود نہ سکی۔ جس کے بعد میں ڈر اور نا سمجھی کے وجہ سے روبوش ہوا تھا۔ مور نے 2022 – 17 – 10 ابنی گر فاری لوکل کی سے بیاب کی۔ جبکہ غیر اجازت کی دھیں بھیر اجازت کر اور خانا بیان کی۔ جبکہ غیر عاضری کے مدھیں بغیر اجازت کر زمید تھر اجازت کر زو وانا بیان کیا۔

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SI سلیم خان انچار پلائون نمبر 55 ضلع سوات نے اپنے بیان میں کنسٹیبل محمد علی نمبر 765 کے بحوالہ مد 18 روز نامج و اضح کیا کہ مور خد 2022–30-30 محرر تھانہ سیدہ شیر یف وزیر زادہ نے اپنے ذاتی نمبر سے کال کی کہ کنسٹیبل مذکور کے خلاف FIR نمبری 308 مور خد 2022–30-04 جرم وزیر زادہ نے اپنے ذاتی نمبر سے کال کی کہ کنسٹیبل مذکور کے خلاف FIR نمبری 308 مور خد 2022–30-04 جرم کی بار بار کوشش کی گئی ہے مگر بے سود ۔ کنسٹیبل مذکور بحوالہ مد 18 روز نامچ 2022–20 سے بذر ایعہ موبائل نون رابطہ کرنے کی بار بار کوشش کی گئی ہے مگر بے سود ۔ کنسٹیبل مذکور بحوالہ مد 18 روز نامچ 2022–04 –29 سے تاحال برستور غیر حاضر چلا آر با ہے۔ مقامی باشندوں سے مذکورہ کی روبو شی کی نسبت تحریری تصدیق نامہ حاصل کیا گیا ۔ بعدہ مور خد 2022–76 –17 کو بوساطت علاقہ مشران لوکل پولیس تھانہ سیدہ شریف کو مقد مہ میں اپنی گر فقاری پیش کر کے جو ایک یوم حراست پولیس گزار نے کے بعد عدالت مشران لوکل پولیس تھانہ سیدہ شرکٹ جیل سیدہ شریف سوات مجھجوایا ہے۔

مقامی ہاشندوں مسمیان طارق ولد مجر سلیم ، عرفان اللہ ولد نور مجر سکنہ فیض آباد سیدو شریف کے بیانات کے مطابق کنسٹیبل مذکورہ بعد از و قوعہ اہلجانہ سمیت کسی نامعلوم مقام پر منتقل ہو کرروپوش ہو چکا تھا۔ اور گھر کو تالہ لگاہوا تھا۔

تفتیتی آفیر SI جہان عالم خان OII تھانہ سیدہ شریف نے اپنے بیان میں واضح کیا کہ (مزم) کنسٹیبل محمہ علی نمبر PPC وقت و قور جائے و قور پر موجود تھا۔ مذکورہ کے خلاف مقدمہ میں نقشہ ضرر بائے کے موصول ہونے پر دفعات PPC ہوت و قور جائے و قور پر موجود تھا۔ مذکورہ کے خلاف مقدمہ میں نقشہ ضرر بائے کے موصول ہونے پر دفعات 337 FIII-VI-337A-VI کی گئی ہے۔ اور جائز گرفاری سے دیدہ وائٹ طور پر گریزاں تھا۔ جس کے خلاف شرائت مچاز ہے 204 ض ف جاری ہو کر جو العام التی ہو کر جو العام التی ہو کر جو العام التی ہو کر جو بعدم التی ہو کر دو التی ہو کر دو ہو التی ہو کر دو ہو کا ایک مور خد 2022-10-16 کو بوساطت علاقہ مشران لوکل ہو لیس تھانہ سیدو شریف کو مقدمہ میں اپنی گرفاری میں بیش کیا گیا۔ مذکورہ کے خد کورہ کو دو سے انگاری ہو کر جس پر میش کیا گیا۔ مذکورہ کو دو سب ضابطہ گرفار کرکے عدالت میں بیش کیا گیا۔ مذکورہ عدالت میں جرم خود سے انگاری ہو کر جس پر عدالت مجاز نے مور خد 2022-10-10 کو جو ڈیٹل حوالات ڈسٹر کٹ جیل سوات بھیجوایا ہے۔ مذکورہ کے خلاف مقدمہ میں عدالت میں جاکہ کورہ کے خلاف مقدمہ میں عدالت میں جاکہ کورہ کورہ کا ایک یوم حراست کو لیس منظور کرنے جس دوران مذکورہ سے آلہ اقدام فقل پستول بر آمد ہوئی۔ عدالت مجاز نے مور خد 2022-10-10 کو جو ڈیٹل حوالات ڈسٹر کٹ جیل سوات جھیجوایا ہے۔ مذکورہ کے خلاف مقدمہ میں عدالت دیاجا کر تفتیش سے ملز م گنہنگار یا یا جاتا ہے۔

عامر الواساء

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جوڈیٹل حوالات ڈسٹر کٹ جیل سیدوشریف سوات بھیجوایا گیا ہے۔ مذکورہ نے اپنے بیان میں اپنے اوپر لگائے گئے الزامات ک سستر دکرتے ہوئے واضح کیا کہ میں موقع واردات پر موجود ہی نہ تھا۔ جبکہ غیر حاضری کے مدمیں اپنی غیر حاضری کو تسلیم کیا ہے۔ تاہم مقدمہ میں تفتیش آفیسر نے مذکورہ کو تفتیش سے گہنٹگار ٹیمرایا ہے۔

البذاء كنسليل محمر على نمبر 765 ايليف فورس بلانون نمبر 55 صلع سوات مور خد 2022-04-29 تا حال غير حاضر رہند اور بلانون ميں حاضرى كو نظر انداز كرنے كى نسبت كوئى تسلى بخش جواب ندوے كر قصور وار پايا جاتا ہے۔ جبكہ حقد مد عد الت ميں زير ساعت ہے۔

ال قدر حالات پر فائنڈنگ رپورٹ مرتب ہو کر بغر ض مناسب تھم گزارش ہے۔

دُيِّي مِن مُنْ رُثُ أَفْ يُولِي

المليث فورس بالاكثر كي موات. DSP-ELITE FORCE/RRF

Malakand region Swat.

Issue F. S. N.

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Anexe

بان ارال كال و الله على م على م على م الله المرور فعلى سوات

برريافت بان كيا) ورخ وقد ايريم 1202، برورسفر م 25 رومان كادن تفال تفرورا على المرقب في المرقب المراسوفي عمال يربعي هو صرباني در الما المراق والديد إنا في مركز لوسك وتا مرنا لمها في فورى لورير بدله المرقوط كاراده شرك فرك بوس اعداد وروس والمرام المراه ما المراه المراه المراه المراه المراع المراه المراع المراه المراع المراه ا عَمَا إِسْ وَسَرِيقًا وَقُ قِيلًا فَ إِسْرُ عُوجِي عَلَيْ كَيَاهُ فِي الْسَلَوْ فِي الْسِرَ هُولِكُ عِنْ إِلَى دل بری اور قعد را به الهای ساء در قه در دعو باری کیا هو وه اور با تا چوان فرون کو شی فوداوره الق معزز ن سرمادف مروز الماها و درا بسارش المالها عسان فرامان على منور مركت الماجير في نسرهود و سروت بن عاسرون بن آدر صال عالم مان اي (نوس بس وال اور حدیقت سے احد مور فیس میسانے ہے کوشش دی ہے۔ وسی کنان ہوں بہی میرابیال کھے.

MIC: 15607-03590459 mob: 0342-9337589.

Dated:

ع ١١٠٠ كياكي وواور بل 2029 س تا حال ولولي عند الموكور في وكور ولي لك تح - ١٠

ررن روسر بو گا دیا دے - صب لعر آ کے روکوش بو کے گے . Attested

جوار وين

PTO



Office of the Superintendent of Police, Elite Force, Malakand Region, Swat



No. 1423 /R, EF

D. No. 8376

Date 28-10-22 Da

Commanaent Eine Force

Dated: 26 / 10 /2022

ORDER .

This order will dispose of the departmental proceeding against Constable Muhammad Ali No.765 of Elite Force platoon No.55 District Swat.

As per information report of District Commander Elite Force Swat, he has been charged in case FIR No.308, dated 30-04-2022 U/S 324/34 PPC Police Station Saidu Sharif, and also remained absent from law full duty without any leave or prior permission from the competent authority w.e. from 29-04-2022 till to date.

In this regard, he was suspended and charge sheet along with Summary of Allegation were issued to him by Deputy Commandant Elite Force vide No.4492-98/EF dated: 09-05-2022 and Mr. Fahad Khan, Acting DSP Elite Force Malakand Region was appointed as enquiry officer. The enquiry officer conducted enquiry proceedings and submitted his findings report that the said constable is found guilty for remaining absent from 29-04-2022 till to date and neglecting attendance in the platoon and also for not giving any satisfactory reason about involvement in case FIR No.308, dated 30-04-2022 U/S 324/34 PPC Police Station Saidu Sharif. Similarly Final Show case Notice was issued to him vide No.1295/R,EF dated: 09-08-2022, which was deliver to him at has resident address(District Jail Swat) through reader District Commander Elite Force Swat, he submitted reply of FSN but his reply was found again the same (unsatisfied). It seems that he has no interest in his current job.

Therefore, I, Asad Zubair, Superintendent of Police Elite Force Malakand Region as competent authority, keeping in view the above facts and circumstances, impose major penalty of "DISMISSAL" from service upon him from the date of absence i.e. 29-04-2022 under Police Rules 1975 (Amended 2014).

Order Announced!

(ASAD ZUBAIR)

Superintendent of Police, Elite Force Malakand Region, Swat.

Copy of above is forwarded to the:-

- 1. Deputy Commandant Elite Force Khyber Pakhtunkhwa Peshawar.
- 2. District Police Officer Swat, for Information.
- 3. SP HQrs Elite Force Peshawar.
- 4. District Commander Elite Force Swat, for Information.
- 5. Accountant Elite Force Khyber Pakhtunkhwa, Peshawar.
- 6. /OASI/ I/C Kot Elite Force Khyber Pakhtunkhwa Peshawar.
- 7. EC/SRC Elite Force Khyber Pakhtunkhwa Peshawar.
- 8. FMC Elite Force along with departmental enquiry file Enls: (43 pages) finding report vide No.1246/R dated 06-07-2022.

Seen

رسان ازال فورشر ١١٠ زيردفع ١١١ فن سان اوال حورسير ١١٠ ع به دريانت سان ليا ، نه مس لعام س و و دفا - کرکستر سمیل به ۱۵۲۶ کمی فروری راسم كرم 34 348 بروراف مليم عرعلى مله وروزر سان ميعن الما , اردولام ما علام نقام لاكر حالي كى - مين حواسل عرف كرفى طال رُے بعدہ طالعہ مرفوان ملنمان باللہ کوالدمیٹرہ عالی مورہ نہ سانیا می در اور افران سانیا اور افرس سانیا دین عے سُن کی مراسم تم عنظمرار آیسی سوم لفسی وا) کی من سراسال مح حورسد 14 نیام سروسرلون MISTER SHO PSSS

DSP-BATE FORCE/RRF
MALAKAND REGION

سان اذال في سليم آي انجارج بلاؤن SS/EF غيريافت بيان ك كوس كين الجارج بالول مر <u>35</u> لقيات يون بالون و خ 20/102 مين الحارة بالاتها، انروز ابرسوات بي لفيات على وقع وقع 17/92 وحل قاعده لوقريا 00:71 إلى تَسَىّ مرازمال تَهِلَى جو عطالى دوسر ماسوائ منظل في على ، 765 ـ باقى لعزى و ورياكر مزوره كنبل مافي ، كوال مرق نهار استرور دور مراف مرج روزا وراج روزا وراج المرس الله المرامي المرام ولا والمرام وراج وراج وراج المرام ا الهاروس داورت دی . منزا مذکوره اوران بالا یا تربی بیرا کوری بیر سسر از پهوکر جاری سرط طری هرجها بی فقر ما وس کشرا مذکوره اوران اله کار بیرا مذکر الله این الله این مقلم بهوکر قداما وس های این الله های مقلم بهوکر قداما وسط الله های مقر بیرا بار بار دار بط کندگی و در بیرا و با موجد الله و میرا و ما موجد الله و میرا و ما ما ما می میرا و م larsSEF USING THEO SI CNIC: 15602-0289037-7 MOB: 0348, 9255129 pated: Attested

سان ۱۱ در سار ۱۵۱ نجاره ۲ نجو کا سپرولزانی الحسوبار الا الحارج بحول سرونون صلى سان دا م فرام 20 م و فيول سيال من و وديقام جومن مربعي درم الله عاذ (ناروا ولا مراح فان في عن ورد فطوطان في امنا- ورد المراسي في الدر نادر عان کا مهارخان در دادرخان این زغان الله ای دی ارسواد الله المراك المراك المراك موس عوراك المال العلول الوراك أم لوصًا وقوى سند وه كم كفي الله الركان كارمان كارسالوارك كارال فحر حارب في م بوق وقوم 25 م 20 الم الم المرال محرف أورال ير بيك كور من مان فيه كالله فيرتر رادر رسادر تحق الم ساق اً معلوم نے ہرادارہ تم فارنگ اُل مند کا مرنگ س وہ دارس بازی انگاہ رساران مادر مان عور المان المع المران المر صم سان فيدي اور الله اور حقى نا معلوى فارشت دركراياً ما (الرس 30) (1/2 6 Ul) Juni 6 # 3434 7 5/ Will of but the مرا وشفل ورست طور بر شب می مراسان ا 17 22 July 23, 2: 13, 719. M Lin 21
Attested

سان اذال كشال في سوايم و وجه درالون مر و ومنهم تفان المرور فيله سوات برريافت سان كيا) ورخ و ليرير دوي برور بيفر جدر ومان كادن تفال هروري املاه ملی جب نم تھ اور آ و تھ جی آ گائے توردلی اور عبدالف ای خرور الله ای خرور الله ای خرور الله ای خرور الله ای خوردلی ساف الله و اگر ای فاطر تھی مامل کرندی کوشت کی دیدن میں ملی جو تا تھر خور ای آنا جو نے خرور یا تھی مراب کی در ای می در ای می مراب کی در ای می مراب کی اراب می اراب کی در ای ایسان خروری اسان خوردلی ایسان خوردلی خوردلی ایسان خوردلی ا لَيْهَاوْنَ فَالْمِيزَاجِكَ لَوْمِنْ لِيَا لَمْ وَرْعِي لَعَلَى مُرِسَ لِمُقَلِّمُ مِنْ وَكُولُ وَيَدُونَ فِي الْمَالِقِ مِنْ فَالْمُرْبِي وَلَا وَيَرْفُونُ فَالْمُونَ فِي الْمُولِ وَلَا مِنْ فَالْمُونُ فِي اللَّهِ فَالْمُونُ فِي اللَّهِ فَاللَّهِ فَاللَّهِ فَاللَّهِ فَاللَّهِ فَاللَّهُ فَاللّمُ فَاللَّهُ فَاللَّاللَّهُ فَاللَّهُ فَاللَّهُ فَاللَّهُ فَاللَّهُ فَاللَّهُ فَاللّلَّهُ فَاللَّهُ فَاللّلَّا فَاللَّهُ فَاللّ عَمَا اسوفَتَ فِي آسًا يَ خرور بأن مر يديه فِي مصروف من الما عالى رسى رفّناء في قرود سي اطرار ملی دسیان نارزمان ولد بهر رای و این اور آ فناب و بی ساکان دیس آن ف رود سی افراد و ملی این این این از مان دیس آن فی دوسرے دی اسلی آن نیسولوں و فیران اور آ فناب و فیرو باکان دیس آن فی اور دسرے دی اسلی آن نیسولوں و فیران می از مرحان و فیران بالا در کر سره دسان اسلی آن نیسولوں و فیران بالم فیر نارزهان قصر آ اور اور قد و درای کی کے دوقع فرائی میں در موری کی کے دوقع فرائی میں در موری کی کارور قدم اور آفر اور آفر اور آفر از می در میں اور آفر از میان در مان اور آفر از می در اور آفر از می در میں اور آفر از می در میں در می در می در می در میں در می در میں در آنے قی ہر کر توسی میں اس باری فوری طور در ببراہ جو ہو اگر اردہ ترکی در اور ہوسود بعد مرسر و مرسر مرس مرس مرس مرس المرس ما مسان على ما الموجر مع ما 134/34 و مرسرا تها تعدول ما موجر مرسم مع 134/34 و مرسوا تها تعدول ما موجود مرسم مع 134/34 و مرسوا تها تعدول ما موجود مرسم معلم 134/34 و مرسوا تها تعدول ما موجود مرسم معلم موجود مرسول معلم موجود مرسم موجود در سری اور جدر از بوانها یا ساع در فه در دعو براری کیا هو وه اور با ت محالات بوت کو می فو داور بدارة معزز ن سرماد في مرور الم الا ويرا بسيد شرى المدامات سان في مول ما والم الله المرت على المرق المرسل المراسلة والمرق المرجيل عالم مان الموشى بش حوالم مرك على المرق في المرجيل عالم مان الموشى بش حوالم من من من المرك المراسلة اورحقيقت سالعبر فقر في بيسانة في كوشش دينا في - وسب كناه بهوان بيرى فيراسال الله مَنْ لِحَالَمُ عَلَيْهُ مِنْ مُعَالِمُ مُعِلِمُ مِعِمِلِمُ مِعِلِمُ مُعِمِلِمُ مِعِمِلِمُ مِعِلِمُ مِعِمِلِمُ مِعِ NIC: 15607-03590459 mob: 0342-9337589. : لمعلميل عدمه عدد عدد الله عدد عدد الله عدد عدد الله عدد عدد الله عدد عدد عدد الله عدد عدد عدد الله عدد عدد عدد الله عدد الل - مِنْ فَيْنَ الزامَاتَ كُولْمَامِ فَيْنَ الزامَاتَ كُولْمَامِ فَيْنَ الزامَاتَ كُولْمَامِ فَيْنَ الرامَاتُ كُولْمَامِ فَيْنَامُ الْمُولِمِينَ الْمُؤْلِمِينَ الْمُلْمِينَ الْمُؤْلِمِينَ الْمُؤْلِمِ وليه فين PTo

معهد الما أي حيث كولس أفسر لولس رولز-ما لط اور عا لون س كولي روا قواست ركاح المراج ا ما قراور مقرم من رولوش کیوں رہے ی جواب نامسجی اور دری وی شَارِ اللهِ عَلَيْهِ عَلَى مُ \$ 76 مِرْ النَّوْنَ عَلَى \$ 55 مُواتَ Attested NIC-15607-0359045-9 Mb1-03429337589 pated

مرادرس دار فی لفت ی آفیس در برادرس داری طر رون سالن ور

را لى وارقًا طلب من سان وين أبارن وورح ورق المورد كيولي هيا ل ور الارتئاراك كولون دلوط في 201 مس مع نادرطان عارساء اداكرن لي بال فسي جاري عي كوفت وقوع فرور برال صيرا يمهي تو وحوال برك سي و جروبي وو ورسمان في الى ولدفر نز براوراني اور فني اس فسن نافعلوم صلو سافع پر شاخت کر لها بول و دوله ما بني و مسلوساف پر شاخت کر لها بول و دوله ما و این فارز می باده فتل ارده فتل ار سے وہ دانیں باؤں کے گفت بر بھیجا آع نار طان بالا بیوں گردن سافین بابی طرف جرم برنگر کا هوے جامعہان صاف ولد عظم آفتاب ولد قدر لوسف عران ولد نادر مان صادر ولد وريساس ا دعول در نا کرزفنی تو ای وجرو رَ عِرْ خَالَ فَسَمَانِ بِاللَّهِ وَ وَرَ عَنْ بِرَ فَعَرِقَ فَأَنِّعَ بِلُورُ فَنْ أَنْ أَنْ فَا ا ور سرب الله الما فو قلمن في وقع عراف في فون ألو (اور ديلًر فيرومون و الور ويلًم فيرومون و المورد ويلم فيرومون و المورد المورد الله في المراد و المراد في المرد في مَا : هَا زَلْمَنْ عِلَمُ الْمِيلِ فَوْرِسُ ١٩٨٤ كَ خَرُونَ عِن أَرْسُلُ فَي عَلَى عَلَمْ الْمُورِ الْمَوْلِيَ قِرْ الشّيّانِ فَرَانَ مَهُ عَلَمْ مِرْسُلُونَ عَلَىٰ عَلَمْ عِلَانَ يَرَى فَقَا مِلَ عَلَى عَلَا عِمَا عَلَمْ الْمُرْكِي فَوْرَ عُورَاتِهِ الْمُو عِلَاقِ فَسُرِلَ فِيهُ الْمُؤْمِنُ رُفَيْنَا رِي تَقَامُ هَذِهِ إِنْ مِنْ مِرْكِ فَقَرْفَ هَذَا إِنْ مِنْ الْمَ كُرُونًا رِي جَارِي كَدِينَ عِنْ مَ وَحرراسَة وَلَو بَسَ كِيهِ عرالتَ فِي زِلُودْسِرٌ كِدِينَ وَإِن وَإِن منظور الوكر بروران حراست ولي علز من الراقدام قبل بسول برا مربوكر وقع في نسائدها كنيارًا المج علزم كابيان الحافر في قطي منركزك لفرض بيان 136/141 عداري واربس كرك جواري بيازيد فؤون الموكر جود الله عبي الما قيالي ورجارا في علزم طالان منهما أعكم ديا لها مي الفتري يدولزم الموكر جود الله المحدد المنظم المراح المنظم المراح المراح

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Affected

DSPLETTE FORCE/RRF MALAKAND REGION SWAT.

مراسالی ا مراسی مردی و فرفت 55 نوع مردی و ارسی و المطال کرا مَفِيْ يَا رَكِي مُعَوِي هِ قِلْ سِيورُ رَلْفَ مِي الْعِيرُ مُثَارِ أَي بِيوِيْ (فِحَارِ 7 كُو . كال وروس ا بنے مع دیر کروس شند (و ۱۲ ملرمان) فریل ولد فیرنز مر ی ملن دم و می ناملی مبرری اسلی آششی سے ا برار ده میل نا نیزشگرے رخی ہونے ما دعو لرد کارلور نے مرطاف ملزمان ایک 2075 Jorge 13.25 My 1324/ 1/2: 40 51 2) 301 308 de vie 115 i 140 sind golf =) cle) l. عرام به فای رونترلت درج رونز کرے مقع فیکن خال مال الله الموري مون المراج الله الما والموري الما والموري الما الموري الما الموري الما الموري الم ك يوط ي نون الود صري نولي ري ك . كنرة طاب رَسْدًا FSL جهوا ر ملزان لوره وقوم بولوسی بور را نه منطقی یا ماک المان المهر (مای وال - Pite is it will read y and it is it مر عبر التخاري ودر ما ر من SHO نه برطاعت طبيع قدر على طالال الما على المام على في (المنال على المع المعال المع عده داخل دس ۱۹ مری سے ربور ع گرانی سے داخل کی سی ماری سے ربور ع گرانی ہے۔ Attested HO 3.35

جناب عالى إ معارب طاع : بني كما ندنة كالله في المدية فورس K.P.K بناع 21 مون 2022 مِمَام وُسِرُ لَكُ على رَبُورًة ميروشرلف موجول سوكر معروض بين كر ساكل وليك فورال ولا يون نمير 55 سوات مين فعار معورة 30 أورال 2022 هفانا كادن وقا عدر رمغان المارك كا جه وال دن دُقا كُفرود سے صبح كرو ق و المال عملي العاجب عم تكفير اون أنه و تكفير سي استا و خورد و نوس خفو ما وسير العُظر قريب مع ليك فرورى إشاركانا شي عنرورى بيه ولله عرب سطرس ع جهي ك كوشش ك سے سرور اس میں میں میں علاوہ دیگر کوی فارس فردس لے ازا بہ اسر -معبوری تھے بلوں سنکائے اور عنہ ورہائے تھی بدیوصہ سب ے 30 لوبل با ارارہ سا جبوری سریم بازار تحفله سوما جدا سے الله منروری اسا و طورد و توش کے طور ا لسان مائ مؤنا في ١٥٠ ورور سے نكل كرجب مقام كرين ورك سركوري سنجا ثومان نما زثراوع كا وقت عُما الموقت من إساء عنرورت ضريرت لين معدوف عُما كاس إنهاء إجانك محصروس لولا ع ملى ع معمان ادرطان وكد بمرام ، حاشطال اور لوفات وعيرو سانان ديم ما الك دوسر عر الملحرا سنون يستولون وتنبع من ما دهند ما الرنك ی یه سبن نارزفان وفنی مالاز کرشده کن ثم مر دعودداری کرما طبیع به شکرتر بر نا درفان به عنده از اس دعوس اری یی چه که وهو عمر هذا شم گریلی ناکها به اسوده مع ما عدا سودت ثم جان بر من مون سروان كرت ابنا مال ركفون أوراسوت مح انے عروز دوستان مے کرو لیانا میں ، مؤری موری بروم محصرطان کا آرادہ ورک كرية موسودا خرمار نفا كووايس كما در اورنا مجعى كبوص ب رويوش عفا جا ب تك مرانفلی من المدر بر مکما مع مع توای دل دری اور مقلر الحوسوا فقا ی ساء بر محمد م رعودنا رفى سريروه لمورم في معالنكم سيء مخوشي خود أور على فرمعززت سرماري دعودن رقى مل يجور المرفرى م لله عات مان محله سان مان مذكورى مركمة على الم ع مرمدة على الم عرمدة على الم عرمدة عربة المرفرة ال ر ما ۱۱۹ مروشرلف و مروشرلف ا کو جان عاع طان ای الوسی کشن کوهوالد کما مرود المرور المراك في مسرا كولي تعلق ما واسط بن عامة عناد كا ساء و محمد وَیک جموع سن کھرے کور صفافت سے بعین مقدی مرسی مصاے کی دستیں ماری کھر میں مصاے کی دستی کھر میں مصاے کی دستی کاریا کی خارل میں کاروائی خارل کرے کا کرما کا دوسے کارال ر بل عمر على مم 765 كيلات فورسر بلاتون ممر 55 24-06-2022

17 6 36,01 21 21/15 العلمديد ع والي وفرم ذا ق Asi من الم 17 وقت 15:55 الكادر م العلم من 30 \frac{1}{22} \hat 308 u \range \sight | \liver \color \color \frac{1}{2} \liver \frac{ 15 14 - a CS, Livil / 8 9 Cd / 1 (324 - 337 H 7 P مسران تعامد لا رسی کرے و مقدم مدم سے ماللہ کرفتا سو ک - 2 6 (6 193 × APO 5 1.48 (6, 10 6) 3 1,6 ساما کا مع مرسا سال میت فرید کرری ۱۰ می درا سا المست الأفرونور عفان عقب العالم على المراد الله المول a policie je Attested 23/06/20x

صلح وأ المائيروت المائية والمائية الع مساد و ال ال قريرها عروب اور ديدها كرم عي هدي و الم في تريم كر مرض أباد سرو شرك لعدار و ولم كى ماصلىم فقام كو حرا قي هـ رباني مقال كو تالم نقايا ج اس دوران وز کرره گفر دورس دور من ع عملی هم دولون - e 2 5 3 ms عرفان الله ولم لورقدم معن الرمروراوم طارق عم ولد قد المرسم مع معندا الربوله لؤ 15602. 8002 636-7 15664-0381100-9 0348-1947 107 0345- 9377729 الكالم إلى ا وقاى لمدن في طرح مركره مان الالك مر معلوم موا تمر می امرم ورای ولا جر نرمرکلراز دؤیر رولوشل <u>ی</u> - کورو س ووركس عيد لمصرف منده كال الله Attested من ور لقدن كامر دني مروره في ور س مرح (ووری - صی عمع دورتی کی لصرف ساطار راورف فناسه المدور مكم الهام الموالا الله في صرفت م حريرة رار عرم الم SiPL 55 Swat

سان زمردفعه ۱۵۷ ف

سن (روی تیم ما . گیرطارت آبها ما می بیشتم سوات . ما می بیشتم سوات . 16/05/2022

الع عرفادرق 1457 كما ترمير الم



0/000 PS 58