


FORM OF ORDER SHEET

Court of _____

Appeal No. 1125/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/08/2024	<p>The appeal of Mr. Alam Sher resubmitted today by Syed Noman Ali Bukhari Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 12/08.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Alam Sher received today i.e on 02.08.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1- Annexure-A of the appeal is illegible be replaced by legible/better one.

No. 491 /Inst./2024/KPST,

Dt. 02/8 /2024.

Amateellib
OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Noman Ali Bukhari Adv.
Supreme Court at Peshawar.

Siv,

objection remain file - resubmitted
of Sher

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

Service Appeal _____/2024

Alam Sher... Versus Police Department

**APPLICATION FOR FIXING THE ABOVE APPEAL
BEFORE THE PRINCIPAL BENCH PESHAWAR.**

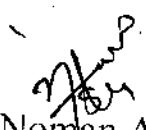
Respectfully Sheweth:

1. That the titled appeal has been filed however no date has been fixed.
2. That the case is pertaining to transfer/adjustment of the applicant and belongs to jurisdiction of Camp Court Bannu Bench.
3. That the counsel is practicing in District Peshawar. The respondent also hail at Peshawar so it will be convenient for appellant to heard the subject case on principal seat at Peshawar.
4. That keeping in view the above facts and circumstances appeal/case may kindly be fixed before the principal bench at District Peshawar in the best interest of justice.
5. That there is no legal bar on acceptance of this application rather it is in the best interest of justice.

It is therefore, most humbly prayed that on acceptance of this application the above title case may kindly be fixed before the principal bench as earlier as possible the best interest of justice.

Applicant/Appellant

Through


Syed Noman Ali Bukhari
Advocates High Court
Peshawar

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1125 /2024

ALAM SHER

V/S

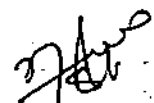
Police Deptt

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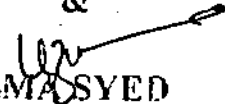
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3.	Copy of show cause	B.	12
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APPELLANT
ALAM SHER

THROUGH:


SYED NOMAN ALI BUKHARI
(ADVOCATE, HIGH COURT)

&


UZMA SYED
(ADVOCATE, HIGH COURT)

Cell No: 0306-5109438

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1125 /2024

Alam Sher Head Constable NO: 01
(Asst: OSI) District Police North, Waziristan.

(Appellant)

VERSUS

1. The Inspector General of Police, KP, Peshawar.
2. The Regional Police Officer, Bannu Region, Bannu.

(Respondents)

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974
AGAINST THE APPELLATE ORDER DATED 05-07-2024
WHEREBY THE DEPARTMENTAL APPEAL OF THE
APPELLANT HAS BEEN PARTIALLY ACCEPTED AND
THE APPELLANT HAS BEEN RE-INSTATED IN TO
SERVICE BY CONVERTING THE PENALTY OF
DISMISSAL FROM SERVICE IN TO PENALTY OF
FORFEITURE OF ONE YEAR APPROVED SERVICE
AND THE INTERVENING PERIOD TREATED AS
LEAVE WITHOUT PAY.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE
ORDER DATED 05/07/2024 MAY KINDLY BE MODIFIED
TO THE EXTENT OF SETTING ASIDE THE PENALTY OF
FORFEITURE OF ONE YEAR APPROVED SERVICE AND
PERIOD TREATED AS LEAVE WITHOUT PAY MAY BE
TREATED ON FULL PAY AND APPELLANT MAY BE
REINSTATED WITH ALL BACK AND CONSEQUENTIAL
BENEFITS. ANY OTHER REMEDY WHICH THIS
TRIBUNAL FIT AND PROPER MAY ALSO BE AWARDED
IN THE FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

(2)

FACTS:

1. That the appellant was serving as Head constable in Police Deptt and the appellant working with full zeal and zest to the entire satisfaction of his superiors.
2. That the DPO North Waziristan has issued appointment orders vide Order Endst: No.6025-31/OASI dated 07.08.2023/OB No.1275 dated 07.08.2023 on the same Endst: and OB, two order have been issued from his office and in the 2nd Order, Six (06) more candidates appointed as Constables, who have not qualified ETEA and also did not recommended by the Regional Section Board".
3. That in light of above orders regarding of recruitment of constables preliminary enquiry was conducted and Mr. Aqeeq Hussain SP/Investigation Bannu was appointed as enquiry officer. Wherein the inquiry officer submitted his findings, wherein he stated that MTO Hassan Yar may be interrogated in the bogus/fake appointment order to highlight the other counterfeiter involved in the practice. Copy of inquiry report is attached as annexure-A.
4. That on the basis of above mentioned fact finding inquiry without recording the statement of MTO Hassan Yar, without issuing charge sheet statement of allegation and without conducting regular inquiry the direct show cause notice was served upon the appellant which was properly replied by the appellant but the authority not agreed with the same and without personal hearing issued dismissal order dated 06/01/2024 received to the appellant on 06/02/2024. Copy of the show cause, reply and dismissal order is attached as annexure-B, C & D.
5. That the appellant being feeling aggrieved filed departmental appeal against the order dated 06/01/2024 before the respondent no.1. The respondent no.1 accepted the departmental appeal vide order dated 07.05.2024 and on acceptance of the departmental appeal the appellant has been re-instated in to service by converting the penalty of dismissal from service in to PENALTY of FORFEITURE of one year approved service and the intervening period treated as leave without pay. Copy of departmental appeal and impugned appellate order is attached as annexure-E & F.
6. That now the appellant comes to this august Tribunal on the following grounds amongst others.


GROUNDS:

(B)

- A) That impugned order dated. 05/07/2024 is against the law, facts, norms of justice and material on record to the extent of minor penalty and period treated as leave without pay. Therefore, not tenable and the order dated 01.12.2022 liable to be modified.
- B) That in case of the appellant no charge sheet was issued before inquiry which is also violation of Supreme Court judgment Cited as 2008 SCMR 609 wherein clearly stated that *inquiry conducted in absence of charge sheet is void-ab-initio and also violation of this tribunal judgment in appeal no: 905/2016 decided on 20.02.2018. In Supreme court judgment cited as 2004 SCMR 294, 2008 PLC cs 1107, 2008 PLC cs 1065 wherein clearly state that the major penalty cannot be imposed on the basis of fact finding inquiry.*
- C) That the appellant was not performed the duties for the period i.e from the date of dismissal to date of re-instatement, due to wrong dismissal order of the appellant, so there is no fault on the part of the appellant, so the appellant is entitled to all back benefits.
- D) That the sufficient grounds of innocence of the appellant exist as per provision of supreme court judgment cited as NLR 2005 TD supreme Court Page 78" as no one punished for the fault of others. So the impugned order is illegal.
- E) That the appellant cannot be held responsible for the lapse/irregularities committed by the department and in such case the Hon'able Supreme Court of Pakistan has held the department responsible not the appellant.
- F) That the appellant is not deprived from the back benefits for the period which they remained out of service without any fault from their side, that According to judgment of Supreme Court reported as 2007 PLC Supreme Court-184 as mentioned below:

"the salaried of civil servant would not be withheld for the intervening period when they remained out of service due to whimsical and arbitrary actions of the functionaries. Civil servant had every right to recover their arrears"

So, in the light of Supreme Court Judgment the appellant is also legally entitled for their salaries.

- 
- G) That no regular inquiry was conducted Neither any documents or report was provided to appellant for examination nor any statement of witnesses recorded in the presence of appellant. Even a chance of cross examination was also not provided to the appellant during fact finding inquiry which is violation of norms of justice.
- H) That there is no order in black and white form to dispense with the regular inquiry which is violation of law, rules and superior court judgment, so the impugned order was in violation of law and rules so not tenable in the eye of law.
- I) That the regional selection committee was constituted for appointment of constable, the regional selection committee recommended 15 passed candidate of ETEA, Then the DPO North Waziristan has issued appointment orders vide Order Endst: No.6025-31/OASI dated 07.08.2023/OB No.1275 dated 07.08.2023, which was properly sent to concerned dealing hand and the same order and service book was sent to SRC branch and the same was sent to Pay branch. The appellant doesn't know about the fake order of 6 other person who issue and process the same, in fact finding inquiry the inquiry officer not dugout the real facts and just give findings against the appellant without any proof. The copy of documents is attached as annexure-G.
- J) That the inquiry officer talk about some FIR which has no concerned with the same but the inquiry officer reliance on the same and on same FIR the inquiry was conducted and filed. Further it is added that the said FIR was not a part of preliminary inquiry TORs.
- K) That there is no chance of self-defense was provide to the appellant and according to Supreme Court judgment mere on the basis of allegation no one should be punished.
- L) That it is the maxim of the law (audi alteram peltrum) that-no one should be unheard, and the impugned order is also passed in violation of article of 10-A OF the constitution of Pakistan which told us about the fair trial which was the fundamental right of the appellant but denied to the appellant. So the impugned order is not tenable in the eye of law.
- M) That the appellant was deprived of his inalienable right of personal hearing and opportunity to cross examine witnesses. The opportunity of offering proper defense was snatched from the appellant. The Hon'able Service Tribunal has been consistently following this yardstick almost in all cases, so departure from the set pattern and that too without any cogent reason in the present

(8)

case would cause irreparable damage to the appellant at the cost of substantial justice. Such inquiry proceeding could not be termed as fair, just and reasonable, as the respondents badly failed to prove the allegation. such practice has already been disapproved by the apex court contained in its judgments PLD 1989 SC 335, 1996 SCMR 802, 2018 PLC (CS)997 and 2019 SCMR 640.

- N) That the name of Tehsinullah was deleted on submission of the affidavit by the Tehsinullah as he got the job at local govt deptt: and the name was deleted after proper permission of superior officer but after deleting the name same was not brought into the knowledge of superior officer, for which the appellant in reply to show cause and departmental appeal already apologize being not trained officer, so all the act done by the appellant is not malafide or with bad intention. Copy of affidavit is attached as annexure-H
- O) That before passing impugned order no codal formalities was fulfilled and no proper procedure was adopted which is the violation of the Police Rules 1975; hence the impugned order is not sustainable, liable to be set aside.
- P) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.

THROUGH:

APPELLANT
ALAM SHER

SYED NOMAN ALI BUKHARI
(ADVOCATE, HIGH COURT)

&
UZMA SYED
(ADVOCATE, HIGH COURT)

(6)

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

SERVICE APPEAL NO. _____ /2024

ALAM SHER

V/S

Police Deptt:

CERTIFICATE:

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.

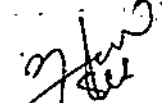

DEPONENT

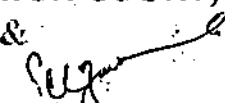
LIT OF BOOKS:

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The Police rules 1975.
3. Any other case law as per need.


APPELLANT
ALAM SHER

THROUGH:


SYED NOMAN ALI BUKHARI
(ADVOCATE, HIGH COURT)

&

UZMA SYED
(ADVOCATE, HIGH COURT)

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

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S.A NO. _____/2024

ALAM SHER

V/S

Police Deptt:

AFFIDAVIT

I, ALAM SHER (Appellant), do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this honorable Tribunal.

DEPONENT
ALAM SHER



OFFICE OF THE
SUPERINTENDENT OF POLICE
INVESTIGATION BANNU.

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Preliminary Enquiry

FINDINGS OF THE PRELIMINARY ENQUIRY IN THE APPOINTMENT ORDERS OF
CONSTABLES DISTRICT NORTH WAZIRISTAN.

Reference. to the directives vide your office letter No.3183/EC dated 19.09.2023 for holding preliminary enquiry in the appointment orders issued by the Office of DPO Office, North Waziristan.

Allegations.

That the DPO Office North Waziristan has issued appointment orders vide Order Endst: No.6025-31/OASI, dated 07.08.2023/OB No.1275 dated 07.08.2023. On the same Endst: and OB, two orders have been issued from his office and in the 2nd order, six (6) more candidates appointed as Constables, who have not qualified ETEA and also didn't recommend by the Regional Selection Board.

The undersigned was directed vide the above quoted reference for holding preliminary enquiry in the appointment orders of Constables issued by the Office of DPO Office, North Waziristan vide Order Endst: No.6025-31/OASI, dated 07.08.2023/OB No.1275 dated 07.08.2023. On the same Endst: and OB, two orders have been issued from his office and in the 2nd order, six (6) more candidates appointed as Constables, who have not qualified ETEA and also didn't recommend by the Regional Selection Board.

In this connection, the office dealing hands i.e. Pay Officer, SRC, OHC, Reader and P.A of DPO Office North Waziristan were summoned vide this office letter No.2606/Inv: dated 20.09.2023 to join the Enquiry process on 21.09.2023 at 10:00 hrs alongwith complete office record/ OB register.

On 21.09.2023, all the dealing hands summoned attended the enquiry process. Heard in person individually and recorded their statements.

STATEMENT OF SENIOR CLERK KIFAYAT ULLAH, PAY OFFICER OF DPO OFFICE NORTH WAZIRISTAN.

Stated in his statement that there are 15 of ETEA qualified candidates had been recruited as Constables vide OB No.1275, dated 07.08.2023. On the same Order Book and date, the second order was issued wherein 21 candidates had been recruited. Although OASI/ SRC are the dealing hands of recruitment process, therefore, they can be in better position to explain about it. The Pay Branch is not the member of recruitment process, therefore, he does not know about it. However, after recruitment process, SRC branch send Service Rolls of the recruited officials to Pay Branch for the purpose of pay. In this case, they received 15 Service Rolls, which are lying on record. Beside this, the pay of 15 candidates including the six (06) more candidates has not yet been processed.

Note:- During Questions/ Answers, the answer of Pay Officer of DPO Office North Waziristan on Question No.03 revealed that addendum and corrigendum can be made in the paragraph on computer. Beside this, a signature can be scanned and can also be brought in use. He further explained that he received 15 service rolls of candidates from SRC branch.

STATEMENT OF HC ALAM SHEER, ASSTT. OHC OF DPO OFFICE NORTH WAZIRISTAN:

Stated in his statement that he is working in DPO Office North Waziristan as Assit: OASI. There are 15 candidates have been recruited through ETEA in District North Waziristan. For the recruitment of these 15 candidates, OASI was selected to join the recruitment process on Region level for Regional Selection Board. At that time, OASI Sultan Ali was on leave. As per directions of DPO North Waziristan, I was participated in the Regional Selection Board as

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OFFICE OF THE
SUPERINTENDENT OF POLICE
INVESTIGATION BANNU.

Preliminary Enquiry

FINDINGS OF THE PRELIMINARY ENQUIRY IN THE APPOINTMENT ORDERS OF
CONSTABLES DISTRICT NORTH WAZIRISTAN.

Reference: to the directives vide your office letter No.3183/RC dated 19.09.2023 for holding preliminary enquiry in the appointment orders issued by the Office of DPO Office, North Waziristan.

Allegations: "That the DPO Office North Waziristan has issued appointment orders vide Order Book No.6025-31/OASL dated 07.08.2023/OB No.1275 dated 07.08.2023. On the same Order Book and OB, two orders have been issued from his office and in the 2nd order, six (6) more candidates appointed as Constables, who have not qualified ETEA and also didn't recommend by the Regional Selection Board".

The undersigned was directed vide the above quoted reference for holding preliminary enquiry in the appointment orders of Constables issued by the Office of DPO Office, North Waziristan vide Order Book No.6025-31/OASL, dated 07.08.2023/OB No.1275 dated 07.08.2023. On the same Order Book and OB, two orders have been issued from his office and in the 2nd order, six (6) more candidates appointed as Constables, who have not qualified ETEA and also didn't recommend by the Regional Selection Board.

In this connection, the office dealing hands i.e. Pay Officer, SRC, OHC, Reader and FA of DPO Office North Waziristan were summoned vide this office letter No.2606/Inv dated 20.09.2023 to join the Enquiry process on 21.09.2023 at 10:00 hrs alongwith complete office record/ OB register.

On 21.09.2023, all the dealing hands summoned attended the enquiry process. Heard in person individually and recorded their statements.

STATEMENT OF SENIOR CLERK KICAYAT BILAL, PAY OFFICER OF DPO OFFICE NORTH WAZIRISTAN.

Stated in his statement that there are 15 of ETEA qualified candidates had been recruited as Constables vide OB No.1275, dated 07.08.2023. On the same Order Book and date, the second order was issued wherein 21 candidates had been recruited. Although OASL/ SEC are the dealing hands of recruitment process, therefore, they can be in better position to explain about it. The Pay Branch is not the member of recruitment process, therefore, he does not know about it. However, after recruitment process, SRC branch send Service Rolls of the recruited officials to Pay Branch for the purpose of pay. In this case, they received 15 Service Rolls, which are lying on record. Beside this, the pay of 15 candidates including the six (06) more candidates has not yet been processed.

Note:- During Questions/ Answers, the answer of Pay Officer of DPO Office North Waziristan on Question No.03 revealed that addendum and corrigendum can be made in the paragraph on computer. Beside this, a signature can be scanned and can also be brought in use. He further explained that he received 15 service rolls of candidates from SRC branch.

STATEMENT OF HC ALAM SHER, ASST. OHC OF DPO OFFICE NORTH WAZIRISTAN.

Stated in his statement that he is working in DPO Office North Waziristan as Asst. OASL. There are 15 candidates have been recruited through ETEA in District North Waziristan. For the recruitment of these 15 candidates, OASL was selected to join the recruitment process on Region level for Regional Selection Board. At that time, OASL Sultan Ali was on leave. As per directions of DPO North Waziristan, I was participated in the Regional Selection Board as

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Naib OASI at Police Lines Bannu, wherein the selection of 15 candidates of District North Waziristan were cleared and later on, they were recruited and sent thereof to Region Office Bannu through Record Branch of DPO Office North Waziristan. He does not know about the recruitment order of 21 candidates.

Note:- During Questions/ Answers, the answer of A/OASI Alam Sher of DPO Office North Waziristan on Question No.02 revealed that he excluded the name of candidate Tehsin Ullah from the recruitment, recommended by the Regional Selection Board mentioned in the Board decision list at S.No.29 on the basis of statement on affidavit. He should excluded his name from the recruitment of Constables on proper office order issued by DPO concerned with information copies to high ups but he failed to do so.

On the answer of Question No.03, A/OASI Alam Sher of DPO Office North Waziristan has disclosed that he has signed the order of 15 candidates from the then DPO Mr. Saleem Riaz while he has no knowledge about the 06 more candidates.

STATEMENT OF JASIM ULLAH, SRC OF DPO OFFICE NORTH WAZIRISTAN.

Stated in his statement that he had received appointment order of 15 ETFA qualified candidates. Their academic verification of 14 candidates has been carried out from BISE Bannu and 01 from BISE D.I.Khan. Beside this, verification CNICs was carried out from NADRA office Miran Shah, which are lying on record. Their Service Rolls were prepared and signed from DPO Sahib and sent to Pay Branch for further necessary process. Furthermore, he does not know about the appointment order of 21 candidates.

STATEMENT OF SULTAN ALI KHAN, OASI OF DPO OFFICE NORTH WAZIRISTAN.

Stated in his statement that there are 15 candidates have been recruited through ETFA in District North Waziristan vide OB No.1275, dated (07.08.2023). That he came to know about the 06 more candidates added in the appointment order of 15 candidates. That the office does not about it and there is no record of it in the office.

Note:- During Questions/ Answers, the answer of OASI Sultan Ali Khan of DPO Office North Waziristan on Question No.03 revealed that he and A/OASI Alam Sher both have the knowledge of computer input, about the addendum and corrigendum in the paragraph. Beside this, a signature can be scanned and also can be brought in use.

STATEMENT OF ARSHAD ULLAH, READER OF DPO OFFICE NORTH WAZIRISTAN.

Stated in his statement that he received appointment order of 15 candidates, selected by the Regional Selection Board for Order Book. There is no entry of 21 candidates in the order book.

Note:- During Questions/ Answers, the answer of Reader Arshad Ullah of DPO Office North Waziristan on Question No.02 revealed that he received orders from OASI branch on daily basis without the Dak Book.

To probe and move further into it, a letter vide this office No.2673/Inv: dated 22.09.2023 was sent to DPO North Waziristan for ascertainment of constabulary numbers allotted to the six (06) more candidates from S.No.16 to 21 in the appointment order.

In this regard, the DPO North Waziristan vide letter No. 6092/OASI, dated 23.09.2023 has reported that the constabulary numbers were allotted to the following officials vide OB No.208, dated 09.04.2021 and OB.No.523, dated 02.10.2021:

1. Sadat Khan s/o Khazan Shah. Constabulary No.2170.
2. Akbar Khan s/o Payo Khan. Constabulary No.2279.
3. Ahmad Jan s/o Bakhti Jan. Constabulary No.1949.
4. Sadqar Azam s/o Miradam. Constabulary No.1845.
5. Maln Ullah Jan s/o Pir Zalim Khan. Constabulary No.2817.

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Preliminary Enquiry

Sahib QASI at Police Lines Hanau, wherein the selection of 15 candidates of District North Waziristan were cleared and later on, they were recruited and sent thereof to Region Office Hanau through Record Branch of DPO Office North Waziristan. He does not know about the recruitment order of 21 candidates.

Note:- During Questions/ Answers, the answer of A/QASI Aman Sher of DPO Office North Waziristan on Question No.02 revealed that he excluded the name of candidate Tehsin Ullah from the recruitment, recommended by the Regional Selection Board mentioned in the Board decision list at S.No.29 on the basis of statement on affidavit. He should excluded his name from the recruitment of Constables on proper office order issued by DPO concerned with information copies to high ups but he failed to do so.

On the answer of Question No.03, A/QASI Aman Sher of DPO Office North Waziristan has disclosed that he has signed the order of 15 candidates from the then DPO Mr. Saqib Riaz while he has no knowledge about the 06 more candidates.

STATEMENT OF JASIM ULLAH, SHO OF DPO OFFICE NORTH WAZIRISTAN.
Stated in his statement that he had received appointment order of 15 FTEA qualified candidates. Their academic verification of 14 candidates has been carried out from HSEI Hanau and 01 from DISE D.L.Khan. Beside this, verification CNICs was carried out from MADRA office Miran Shah, which are lying on record. Their Service Rolls were prepared and signed from DPO Sahib and sent to Pay Branch for further necessary process. Furthermore, he does not know about the appointment order of 21 candidates.

STATEMENT OF SULTAN ALI KHAN, OASI OF DPO OFFICE NORTH WAZIRISTAN.
Stated in his statement that there are 15 candidates have been recruited through FTEA in District North Waziristan vide OB No.1275, dated 07.08.2023. That he came to know about the 06 more candidates added in the appointment order of 15 candidates. That the office does not about it and there is no record of it in the office.

Note:- During Questions/ Answers, the answer of OASI Sultan Ali Khan of DPO Office North Waziristan on Question No.03 revealed that he and A/QASI Aman Sher both have the knowledge of computer input, about the addendum and corrigendum in the paragraph. Beside this, a signature can be scanned and also can be brought in use.

STATEMENT OF ARSHAD ULLAH, READER OF DPO OFFICE NORTH WAZIRISTAN.
Stated in his statement that he received appointment order of 15 candidates, selected by the Regional Selection Board for Order Book. There is no entry of 21 candidates in the order book.

Note:- During Questions/ Answers, the answer of Reader Arshad Ullah of DPO Office North Waziristan on Question No.02 revealed that he received orders from OASI branch on thilly basis without the Dak Book.

To probe and move further into it, a letter vide (his office No.2673/Inv) dated 22.09.2023 was sent to DPO North Waziristan for ascertainment of constabulary numbers allotted to the six (06) more candidates from S.No.16 to 21 in the appointment order.

In this regard, the DPO North Waziristan vide letter No.6092/OASI, dated 23.09.2023 has reported that the constabulary numbers were allotted to the following officials vide OH No.208, dated 09.04.2021 and OH No.523, dated 02.10.2021:

1. Sadat Khan s/o Khazun Shah, Constabulary No.2128.
2. Akbar Khan s/o Payu Khan, Constabulary No.3279.
3. Ahmad Jan s/o Bakhtul Jan, Constabulary No.1949.
4. Sadear Azam s/o Miradam, Constabulary No.1845.
5. Main Ullah Jan s/o Pir Zafim Khan, Constabulary No.2817.

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Preliminary enquiry

Muhi ud Din s/o Gulbadin, Constabulary No. 3271.

The above mentioned names of officials were found correct by cross checking with OB No. 208, dated 09.04.2021 and OB No. 523, dated 02.10.2021 issued by the Office of DPO North Waziristan, copies enclosed for perusal.

Furthermore, the Assistant Director (LEA Cell) NADRA Peshawar was also addressed for provision of data as well as family tree of the six (06) individuals mentioned in appointment order of 21 candidates from S.No. 16 to 21. In this regard, the report of Assistant Director (LEA Cell) NADRA Peshawar is still awaited. To expedite the process of preliminary enquiry, reminder has been issued to the Assistant Director (LEA Cell) NADRA Peshawar vide this office letter No. 3277/Inv: dated 25.10.2023.

Similarly, Mr. Saleem Riaz, the then DPO North Waziristan has been addressed to sort out the actual facts, verify the signatures as well as the attestation. Mr. Saleem Riaz the then DPO North Waziristan has reported vide letter No. 2206/R, EF/MKD, dated 11.10.2023 that the appointment order of 15 candidates issued by the DPO Office North Waziristan vide OB No. 1275, dated 07.08.2023 and Endst: No. 6025-31/OASL, dated 07.08.2023 is genuine and correctly bears his signatures being DPO North Waziristan, while the appointment order of 21 candidates bearing the same OB No. 1275, dated 07.08.2023 and Endst: No. 6025/OASL, dated 07.08.2023 is totally fake/fabricated/concocted and counterfeited. Some hidden hands with the intention of maula, rida and forgery have scanned his signature/ attestation over it. Furthermore, Mr. Saleem Riaz, Regional Commander, Elite Force Malakand Region, Swat the then DPO North Waziristan has reported that he is not in a position to point out the hidden hands involved in the forgery.

Beside this, DPO North Waziristan vide letter No. 3279/Inv: dated 25.10.2023 has been addressed for the purpose to inform the 06 individuals mentioned in the 21 candidates appointment order as constable through the local Police on their home address for appearance before the undersigned on 30.10.2023 at 10:00 hrs for recording their statements. The following 03 individuals have been appeared before the enquiry proceedings while the other 03 individuals did not appear;

1. Khalid Raza s/o Ihsan Ullah.
2. Sadiq Noor s/o Ahmad Jan.
3. Rahat Ullah s/o Khalil Ullah.

STATEMENT OF KHALID RAZA S/O IHSAN ULLAH R/O KHADI MIRALI DISTRICT NORTH WAZIRISTAN.

Stated in his statement that his father talked to one namely Sadiq Ullah for his recruitment in Police/ Khasadar on the basis that whenever recruited then the amount will be paid. Sadiq Ullah has petrol pump situated on the left side of Eidak Nizamiya Madrasa towards Miranshah. Further stated that his CNIC copy was handed over to Sadiq Ullah by his father and he is running Parchoon shop (general store). He is Matric pass and his father mobile phone number is 0331-2300214. He does not know about the mobile phone number of Sadiq Ullah of petrol pump, however, he contacts his father.

STATEMENT OF SADIQ NOOR S/O AHMAD JAN R/O EIDAK DISTRICT NORTH WAZIRISTAN.

Stated in his statement that he is fond of services of Police/Khasadar and he wants to get it by any means necessary. He has talked with Sadiq Ullah r/o Eidak of Police Office at Miranshah Cantt, who replied that you will be appointed as you wish. And from whom the service will be transferred then you will pay the amount and whenever the DPO will be transferred then you will be appointed.

STATEMENT OF RAHAT ULLAH S/O KHALIL ULLAH R/O KHADI MIRALI DISTRICT NORTH WAZIRISTAN.

Stated in his statement that his father talked to one namely Sadiq Ullah who is school teacher in Islamia School Eidak for his recruitment in Police/ Khasadar. After recruitment then he will pay amount of Rs. 12,80,000/-. The School in which Sadiq Ullah is a teacher, situated behind Qasmi Market Eidak. Sadiq Ullah has also petrol / diesel Station Duma.

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Preliminary enquiry

6. Muhi ud Din s/o Gulbadin, Constabulary No.3271.

The above mentioned names of officials were found correct by cross checking with OB No.208, dated 09.04.2021 and OB No.523, dated 02.10.2021 issued by the Office of DPO North Waziristan, copies enclosed for perusal.

Furthermore, the Assistant Director (LEA Cell) NADRA Peshawar was also addressed for provision of data as well as family tree of the six (06) individuals mentioned in appointment order of 21 candidates from S.No.16 to 21. In this regard, the report of Assistant Director (LEA Cell) NADRA Peshawar is still awaited. To expedite the process of preliminary enquiry, reminder has been issued to the Assistant Director (LEA Cell) NADRA Peshawar vide this office letter No.3277/Inv: dated 25.10.2023.

Similarly, Mr. Saleem Riaz, the then DPO North Waziristan has been addressed to sort out the actual facts; verify the signatures as well as the attestation. Mr. Saleem Riaz the then DPO North Waziristan has reported vide letter No.2206/R,EF/MKD, dated 11.10.2023 that the appointment order of 15 candidates issued by the DPO Office North Waziristan vide OB No.1275, dated 07.08.2023 and Ends: No.6025-31/OASI, dated 07.08.2023 is genuine and correctly bears his signatures being DPO North Waziristan, while the appointment order of 21 candidates bearing the same OB No.1275, dated 07.08.2023 and Ends: No.6025/OASI, dated 07.08.2023 is totally fake/fabricated/connected and counterfeited. Some hidden hands with the intention of mala fide and forgery have scanned his signature/ attestation over it. Furthermore, Mr. Saleem Riaz, Regional Commander, Elite Force Malakand Region, Swat the then DPO North Waziristan has reported that he is not in a position to point out the hidden hands involved in the forgery.

Beside this, DPO North Waziristan vide letter No.3279/Inv: dated 25.10.2023 has been addressed for the purpose to inform the 06 individuals mentioned in the 21 candidates appointment order as constable through the local Police on their home address for appearance before the undersigned on 30.10.2023 at 10:00 hrs for recording their statements. The following 03 individuals have been appeared before the enquiry proceedings while the other 03 individuals did not appear;

1. Khalid Raza s/o Ihsan Ullah.
2. Sadiq Noor s/o Ahmad Jan.
3. Rahat Ullah s/o Khalil Ullah.

STATEMENT OF KHALID RAZA S/O IHSAN ULLAH R/O KHADI MIRALI DISTRICT NORTH WAZIRISTAN.

Stated in his statement that his father talked to one namely Sadiq Ullah for his recruitment in Police/ Khasadar on the basis that whenever recruited then the amount will be paid. Sadiq Ullah has petrol pump situated on the left side of Eidak Nizamniya Madrasa towards Miranshah. Further stated that his CNIC copy was handed over to Sadiq Ullah by his father and he is running Parchoon shop (general store). He is Matric pass and his father mobile phone number is 0331-2300214. He does not know about the mobile phone number of Sadiq Ullah of petrol pump, however, he contacts his father.

STATEMENT OF SADIQ NOOR S/O AHMAD JAN R/O EIDAK DISTRICT NORTH WAZIRISTAN.

Stated in his statement that he is fond of services of Police/Khasadar and he wants to get it by any means necessary. He has talked with Sadiq Ullah r/o Eidak of Police Office at Miranshah Cantt, who replied that you will be appointed as you wish. And from whom the service will be transferred then you will pay the amount and whenever the DPO will transferred then you will be appointed.

STATEMENT OF RAHAT ULLAH S/O KHALIL ULLAH R/O KHADI MIRALI DISTRICT NORTH WAZIRISTAN.

Stated in his statement that his father talked to one namely Sadiq Ullah who is school teacher in Islamia School Eidak for his recruitment in Police/ Khasadar. After recruitment then he will pay amount of Rs.12,00,000/-. The School in which Sadiq Ullah is a teacher, situated behind Qoumi Market Eidak. Sadiq Ullah has also owned / directed Sadiq Pump.

CamScanner



Best copy

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Preliminary Enquiry

wherein his brother is present there and oftenly Sadq Ullah came to petrol pump. His father has sugar and Ghee shop at Khadi Market. Furthermore he is driver of trailer in Saudi Arabia.

Conclusion.

Keeping in view the above facts and circumstances, statements of the dealing hands of DPO Office North Waziristan, report of Mr. Saleem Riaz the then DPO North Waziristan and questions / answers of the dealing hands of the office of DPO North Waziristan, the undersigned reached to the conclusion that the fonts used in original order and subsequent in bogus one are similar and generated from the same computer of OASI Branch of the DPO Office, District North Waziristan.

It is pertinent to mention here that this reality cannot be ignored regarding that Pay Officer, OASI, SRC/ Establishment Clerk branches are the nexus of a chain. All the dealing hands working in a pre-planned manners and no one deviated from the segment. OASI is responsible for recruitment process. SRC is responsible for preparation of Service Rolls/ Service Books of the appointee. Pay Officer is responsible for drawing their salaries.

To proceed further deep into the matter, I called the Jan Muhammad auditor of the Account Office North Waziristan to office, he was not ready for giving in writing, however, he told that the fake / bogus order of 21 Constables was brought by MTO Hassanyar of North Waziristan Police. This practice was continued in North Waziristan Police and case FIR No.43 dated 21.04.2022 u/s 419/420/468/471 PPC PS Miranshah was lodged previously in another case, which already been routed to Region Office Bannu vide DPO North Waziristan letter No.5217/PA/Enquiry, dated 20.06.2022 for referring the case to Anti- Corruption Department for further legal process.

The statements of Kallid Raza, Sadq Noor and Rahat Ullah reveal that Sadq Ullah owner of the Petrol / Diesel Pump "Saidgo" Eidak N.W was in link with the three candidates through their fathers and Sadq Ullah dealer of Petrol / Diesel might be linked with MTO Hassan Yar as he also deals in Petrol / Diesel from the Department side and thus the six (06) candidates names etc added in the original appointment order of fifteen (15) candidates detecting the main role of MTO Hassan Yar and Asstt: OASI Alam Sher enlarging the order in computer and subsequent its print and issuance of fake appointment order of 6 candidates included with 15 candidates.

Preliminary Asstt: OASI Alam Sher and MTO Hassanyar have been found guilty of the generating and implementing the fake / bogus order of the 21 Constables on the same issuing JB No.1275 Endst: No.6025-31/OASI dated 07.08.2023.

As Jan Muhammad auditor of the Account Office North Waziristan has disclosed that the fake / bogus order of 21 candidates was brought by MTO Hassanyar of North Waziristan Police, therefore, MTO Hassanyar of North Waziristan may be interrogated in the bogus/ fake appointment order to highlight the other actual counterfeiter involved in the practice, please.

P.A.
Issue SCNs To P.O
OASI, MTO & P.O

(AQEEQ HUSSAIN)
L.B/PPM
Superintendent of Police,
Investigation, Bannu.

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Preliminary

wherein his brother is present there and oftenly Sadiq Ullah came to petrol pump. His father has sugar and Ghee shop at Khadi Market. Furthermore he is driver of trailer in Saudi Arabia.

Conclusion.

Keeping in view the above facts and circumstances, statements of the dealing hands of DPO Office North Waziristan, report of Mr. Saleem Riaz the then DPO North Waziristan and questions / answers of the dealing hands of the office of DPO North Waziristan, the undersigned reached to the conclusion that the fonts used in original order and subsequent in bogus one are similar and generated from the same computer of OASI Branch of the DPO Office, District North Waziristan.

It is pertinent to mention here that this reality cannot be ignored regarding that Pay Officer, OASI, SRC/ Establishment Clerk branches are the nexus of a chain. All the dealing hands working in a pre-planned manners and no one deviated from the segment. OASI is responsible for recruitment process. SRC is responsible for preparation of Service Rolls/ Service Books of the appointee. Pay Officer is responsible for drawing their salaries.

To proceed further deep into the matter, I called the Jan Muhammad auditor of the Account Office North Waziristan to office, he was not ready for giving in writing, however, he told that the fake / bogus order of 21 Constables was brought by MTO Hassanyar of North Waziristan Police. This practice was continued in North Waziristan Police and case FIR No.43 dated 21.04.2022 u/s 419/420/468/471 PPC PS Miranshah was lodged previously in another case, which already been routed to Region Office Bannu vide DPO North Waziristan letter No.5217/PA/Enquiry, dated 20.06.2022 for referring the case to Anti-Corruption Department for further legal process.

The statements of Kalid Raza, Sadiq Noor and Rahat Ullah reveal that Sadiq Ullah owner of the Petrol / Diesel Pump "Saidgo" Eidak N.W was in link with the three candidates through their fathers and Sadiq Ullah dealer of Petrol / Diesel might be linked with MTO Hassan Yar as he also deals in Petrol / Diesel from the Department side and thus the six (06) candidates names are added in the original appointment order of fifteen (15) candidates detecting the main role of MTO Hassan Yar and Asstt: OASI Alam Sher enlarging the order in computer and subsequent its print and issuance of fake appointment order of 6 candidates included with 15 candidates.

Preliminary Asstt: OASI Alam Sher and MTO Hassanyar have been found guilty of the generating and implementing the fake / bogus order of the 21 Constables on the same issuing IB No.1275 Endt: No.6025-31/OASI dated 07.08.2023.

As Jan Muhammad auditor of the Account Office North Waziristan has disclosed that the fake / bogus order of 21 candidates was brought by MTO Hassanyar of North Waziristan Police, therefore, MTO Hassanyar of North Waziristan may be interrogated in the bogus/ fake appointment order to highlight the other actual counterfeiter involved in the practice, please.

P.A.
Issue SCNs To P.O.
O.A.S.I, MTO & P.O.

(AQEEQ HUSSAIN)
L.B/PPM
Superintendent of Police,
Investigation, Bannu.

B

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SHOW CAUSE NOTICE

You Alam Sher HC while posted as Asstt: OASI DPO Office North Waziristan have rendered yourself liable to be proceeded under rule 5(3) of the Khyber Pakhtunkhwa, Police Rules, 1975 (amended in 2014) for committing the following misconduct:-

- Perusal of Preliminary Enquiry - pertaining to the orders transpires "That the DPO North Waziristan has issued appointment orders vide Order Indst: No.6025-31/OASI dated 07.08.2023/OB No.1275 dated 07.08.2023. On the same Indst: and OB, two orders have been issued from his office and in the 2nd Order, six(6) more candidates appointed as Constables, who have not qualified ETEA and also did not recommend by the Regional Selection Board".
- That as per your statement "There are fifteen (15) of ETEA qualified candidates have been recruited through ETEA as constables in District North Waziristan. For the recruitment of these 15 candidates, OASI was selected to join the recruitment process on Region level for Regional Selection Board. At that time, OASI Sultan Ali was on leave. As per directions of DPO North Waziristan, you were participated in the Regional Selection Board as Naib OASI at Police Lines Bannu, wherein the selection of 15 candidates of District North Waziristan were cleared and later on, they were recruited and sent thereof to Region Office Bannu through Record Branch of DPO Office North Waziristan. Further added that you do not know about the recruitment order of 21 candidates.
- During preliminary enquiry, reply to Q:No.2 you stated that you excluded the name of candidate Tehsin Ullah from the recruitment, recommended by the Regional Selection Board mentioned in the Board decision list at S.No.29 on the basis of statement on affidavit. You should exclude his name from the recruitment of constables on proper office order issued by DPO concerned with information copies to high-ups but you failed to do so.
- Answer of Question No.03, you have disclosed that you have signed the order of 15 candidates from the then DPO North Waziristan Mr.Sateem Riaz vide OB No.1275, dated 07.8.2023 while you have no knowledge about the 06 more candidates. As on the same Order Book and date, the second order was issued wherein 21 candidates have been recruited.
- That this reality cannot be ignored that you being Asstt:OASI of DPO Office North Waziristan are the nexus of a chain because such incident was also previously reported vide FIR No.43 dated 21.4.2022 w/s 419/420/468/471 PPC PS Miranshah.

That by taking cognizance of the matter, the undersigned as competent authority under the said rules, propose stern action against you by awarding one of the major punishments as provided in the rules

You are, therefore called upon to show cause as to why you should not be imposed upon one of the major punishments for the said deviant misconduct under Khyber Pakhtunkhwa, Police Rules 1975 (amended in 2014).

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

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

Alam Sher Asstt:OASI
DPO Office North Waziristan.


Regional Police Officer,
Bannu Region
Bannu

No. 280 PA. Dated: 14/11/2023.
CC:

DPO North Waziristan for information and necessary action, please.

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جواب رہی شوکا زونٹس

جناب عالی!

بحوالہ مشمولہ شوکا زونٹس نمبر PA/280 مورخہ 14.11.2023 جاریہ دفتر جناب RPO صاحب بنوں رجمن، بنوں معروض ہوں کہ:-

1- جہاں تک شوکا زونٹس میں ذکر شدہ ابتدائی انکوائری میں ضلع شمالی وزیرستان پولیس میں سابقہ DPO نے بحوالہ آرڈر اور سمنٹ نمبر OASI/31-6025 مورخہ 07.08.2023 اور OB نمبر 1275 پر 15 اہلکاروں کے پولیس میں بھرتی ہونے اور اسی OB اور آرڈر اور سمنٹ پر 21 اہلکاروں کے بھرتی ہونے کا ذکر ہے جنہوں نے نہ تو اینٹائیٹ پاس کیا تھا اور نہ ہی ریجنل سیکرٹریٹس بورڈ نے ان کو Recommend کئے ہوئے تھے۔ چونکہ من سائل نے پہلے بھی اس بابت انکوائری میں یہ بیان دے چکا ہوں کہ میں نے سابقہ DPO صاحب سے صرف اور صرف 15 اہلکاروں کے آرڈر دستخط کئے تھے نہ کہ 21 اہلکاروں کے جو کہ بطور ثبوت ہمراہ "A" لفٹ ہے۔

2- اس بابت ابتدائی انکوائری میں بھی پیرا نمبر 1 کے متعلق بیان دے چکا ہوں کہ ضلع شمالی وزیرستان پولیس میں تمام اہلکاروں کے آرڈر ہونے تھے۔ چونکہ ریجنل سیکرٹریٹس بورڈ نے OASI کو بھرتی Process کیلئے سیکرٹریٹ کیا ہوا تھا مگر اس وقت وہ چھٹی پر تھے۔ جناب سابقہ DPO صاحب نے مجھے بطور نامہ OASI زبانی کہہ کر ریجنل سیکرٹریٹس بورڈ میں بھرتی کے Process کے لئے بھیج دیا۔ اور میں نے ریجنل سیکرٹریٹس بورڈ میں بھرتی میں حصہ لیا جو کہ پولیس لائن بنوں میں ہوئی تھی۔ ریجنل سیکرٹریٹس بورڈ نے نوٹس 29 امیدواران کا لسٹ بغرض دستخطی سابقہ DPO صاحب کو بھیج دی کیونکہ وہ ریجنل سیکرٹریٹس بورڈ کمیٹی کا ممبر تھا۔ جس کو باقاعدہ سابقہ DPO صاحب نے ہر سمنٹ پر دستخط کر کے RPO آفس بنوں واپس ارسال کر دی تھی جو کہ ہمراہ "B" لفٹ ہے۔ اس کے علاوہ SRC برانچ نے 15 اہلکاروں کے شناختی کارڈ کے نوٹو سٹیٹ بغرض ریجنل سیکرٹریٹس بورڈ آفس میران شاہ کو بحوالہ لیٹر نمبر SRC/5955 مورخہ 01/08/2023 بھیج دی تھی جو کہ ہمراہ "C" لفٹ ہے۔ جبکہ گراؤنڈ چیک کے لئے OASI برانچ نے بحوالہ لیٹر نمبر OASI/3398 مورخہ 06/06/2023 جناب SP سٹیشن برانچ ساؤتھ رجمن بنوں ارسال کی تھی جو کہ ہمراہ "D" لفٹ ہے۔ اس کے علاوہ SRC برانچ نے بحوالہ لیٹر نمبر SRC/4644 مورخہ 20/06/2023 کو 14 اہلکاروں کے تعلیمی اسناد کو بغرض ریجنل سیکرٹریٹس بورڈ کو بھیج دیے تھے جو کہ ہمراہ "E" لفٹ ہے جبکہ ایک امیدوار کے تعلیمی اسناد کو بحوالہ لیٹر نمبر SRC/4430 مورخہ 16/06/2023 بغرض ریجنل سیکرٹریٹس بورڈ بھیج دی تھی جو کہ ہمراہ "F" لفٹ ہے۔ ان تمام مراحل کے بعد من نامہ OASI نے سابقہ DPO صاحب سے 15 اہلکاروں کے آرڈر دستخط کئے جو کہ ریجنل سیکرٹریٹس بورڈ نے Recommend کئے تھے۔ البتہ 21 اہلکاروں کے بھرتی ہونے کا مجھے کچھ بھی معلوم نہیں۔

3- جیسا کہ ابتدائی انکوائری کے دوران میں نے سوال نمبر 2 کے جواب میں یہ کہا ہے کہ میں نے امیدوار حسین اللہ کا نام بھرتی لسٹ سے نکالا تھا جو کہ ریجنل سیکرٹریٹس بورڈ نے سیریل نمبر 29 پر Recommend کیا تھا۔ میں نے بحکم سابقہ DPO جناب سلیم ریاض صاحب، ان کا نام لسٹ سے اس لئے نکالا تھا کہ اس نے باقاعدہ اسٹامپ پیپر پر یہ لکھ کر دیا تھا کہ "میں بخوشی خود پولیس کی نوکری نہیں کرنا چاہتا کیونکہ میرا کل گورنمنٹ میں جاب ہوا ہے" جس کی کاپی ہمراہ "G" لفٹ ہے۔ البتہ اس بابت آفسران بالا کو اقدام نہ کرنے میں میری کوئی بدینگی شامل نہیں کیونکہ شمالی وزیرستان میں ضم شدہ اجلاس میں سے ہے جو کہ تجربہ نہ ہونے کی وجہ سے یہ کہتا ہی نہ ہوا ہے اور من اسٹنٹ OASI احمد کے لئے محتاط رہنا۔

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4- جیسا کہ میں نے سوال نمبر 3 کے جواب میں یہ بات عیاں کی ہے کہ میں نے سابقہ DPO جناب سلیم ریاض صاحب سے بحوالہ آرڈر بک نمبر 1275 مورخہ 07/08/2023 پر 15 اہلکاروں کے آرڈر دستخط کئے تھے۔ جبکہ 6 دیگر امیدواروں کے متعلق میں لاعلم ہوں۔ کیونکہ جو دوسرا آرڈر ایس او بی اور مورخہ پہ ہوا ہے جس میں 21 اہلکاران کو بھرتی کیا جانا مقصود تھا اس بابت مجھے کچھ علم نہیں۔

5- جہاں تک الجنباب کی جانب سے الزام کا تعلق ہے کہ اس حقیقت کو نظر انداز نہیں کیا جاسکتا کہ میں بطور اسسٹنٹ OASI تعینات ہوں اور ایک ہی زنجیر کی کڑی ہوں۔ مزید برآں جو FIR کا ذکر ہے۔ اس کیس کی ابتدائی انکوائری SP انوسٹی گیشن شمالی وزیرستان نے کی تھی۔ انکوائری آفیسر کی فائنڈنگ میں پرائیویٹ شخص/اشخاص کا ملوث ہونا پایا گیا تھا۔ جن کے خلاف باقاعدہ FIR چاک ہوئی تھی۔ جس کی فوٹو کاپی ہمراہ "H" لقب ہے۔ اور اس میں دفتری سٹاف خصوصاً من نائب OASI کی کسی قسم کی Involvement نہیں پائی گئی تھی۔ اور نہ ہی ابھی بطور اسسٹنٹ OASI ملوث ہو سکتا ہوں۔

مزید یہ کہ میں نے ہمیشہ اپنی ذیولٹی نہایت ایماندارانہ، دیانتدارانہ اور دلجوئی کے ساتھ سرانجام دی ہوئی ہے اور انشاء اللہ آئندہ بھی کرونگا۔ من نائب OASI کے خلاف جو الزامات لگائے گئے ہیں من گھڑت اور بالکل بے بنیاد ہیں۔ لہذا من نائب OASI الجنباب کے حضور استدعا کرتا ہوں کہ جاری شدہ شو کاز نوٹس کو داخل دفتر فرمایا جائے۔

علاوہ ازیں اس سلسلے میں، الجنباب کے حضور میں ذیاتی طور پر بھی پیش ہونا چاہتا ہوں۔ تاکہ اپنی بے گناہی کے مدلل ثبوت ہائے پیش کر سکوں۔

عین ناحت پروری ہوگی۔

مورخہ 24 نومبر 2023۔

عارضی

HHC عالم شہیر خان متعینہ نائب OASI ڈی پی او افس شمالی وزیرستان۔

Handwritten signature and stamp of HHC, including the name 'عالم شہیر خان' and 'نائب OASI'.

D

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3/8
6/2/24

ORDER

This order will dispose of departmental enquiry conducted against HC No.01 Alam Sher No.00938102 (Asstt: OASI) District Police North Waziristan, wherein he has rendered himself liable to be proceeded under rule 5(3) of the Khyber Pakhtunkhwa, Police Rules, 1975 (amended in 2014) for committing the following misconduct conveyed to him vide this office No.280/PA dated 14.11.2023.

> Perusal of Preliminary Enquiry - pertaining to the orders transpires "That the DPO North Waziristan has issued appointment orders vide Order Endst: No.6025-31/OASI dated 07.08.2023/OB No.1275 dated 07.08.2023. On the same Endst: and OB, two orders have been issued from his office and in the 2nd Order, six(6) more candidates appointed as Constables, who have not qualified ETEA and also did not recommend by the Regional Selection Board".

> That as per his (Alam Sher) statement "There are fifteen (15) of ETEA qualified candidates have been recruited through ETEA as constables in District North Waziristan. For the recruitment of these 15 candidates, OASI was selected to join the recruitment process on Region level for Regional Selection Board. At that time, OASI Sultan Ali was on leave. As per directions of DPO North Waziristan, he (Alam Sher) participated in the Regional Selection Board as Naib OASI at Police Lines Bannu, wherein the selection of 15 candidates of District North Waziristan were cleared and later on, they were recruited and sent thereof to Region Office Bannu through Record Branch of DPO Office North Waziristan. Further added that he does not know about the recruitment order of 21 candidates.

During enquiry, reply to Q:No.2 he (Alam Sher) stated that he excluded the name of candidate Tehsin Ullah from the recruitment, recommended by the Regional Selection Board mentioned in the Board decision list at S.No.29 on the basis of statement on affidavit. He (Alam Sher) should exclude the name from the recruitment of constables on proper office order to be issued. DPO concerned with information copies but he failed to do so.

Answer of Question No.03, he (Alam Sher) has disclosed that he (Alam Sher) has got signed the order of 15 candidates from the then DPO North Waziristan Mr. Saleem Riaz vide OB No.1275, dated 07.8.2023 while he has no knowledge about the 06 more candidates. As on the same Order Book and date, the second order was issued wherein 21 candidates have been recruited.

That this reality cannot be ignored that he being Acting OASI of DPO Office North Waziristan is the nexus of a chain because such incident was also previously reported vide FIR No.43 dated 21.4.2022 u/s 419/420/468/471 PPC PS Miranshah.


SI Investigation Bannu was appointed as Enquiry Officer. The E.O conducted inquiry into the allegations and submitted his findings, wherein the E.O concluded that the allegations leveled against him have been proved with undeniable and irrefutable evidences. Therefore, he was recommended by the E.O for award of major punishment.

He was served with Show Cause Notice. Reply to the SCN was received and he was heard in person during orderly room held in RPO Office Bannu on 18.01.2024. His plea was found unsatisfactory.

Therefore, I, Qasim Ali Khan, PSP, Regional Police Officer, Bannu Region Bannu, in exercise of the powers vested in me under Khyber Pakhtunkhwa Police Rules, 1975 (amended in 2014) hereby dismiss HC Alam Sher No.01 Personnel No. 00938102 from service with immediate effect.

Order Announced.

update


Regional Police Officer,
Bannu Region,
Bannu

S/O
130/OASI
1/11/24

16

No. 64-66/PA, dated Bannu the 16/1/2024

Cc:

- > DPO-North Waziristan for information and necessary.
- > DAO North Waziristan for information and necessary.
- > OS/EC RPO Office Bannu.


Regional Police Officer,
Bannu Region,
Bannu

خدمت جناب ایچ آر ڈی آئی ایس سرحد خیبر پختونخوا پشاور
 عنوان: گلخانہ اعلیٰ بر خلاف آرڈر اور سمٹ نمبر 64-66/PA مورخہ 26.01.2024 جاریہ جناب ریجنل پولیس
 آفیسر صاحب بنوں ریجن بنوں

جناب عالی

گزارش منظور افور یہ ہے کہ سائل کے ساتھ بحوالہ آرڈر اور سمٹ نمبر بالا میں نہایت قلم اور نا انسانی ہوئی ہے۔ جس میں کسی قسم کے انصاف کے
 تقاضوں کو برقرار رکھا گیا ہے اور کسی قسم کی ماتحت پروری کا ثبوت دیا گیا ہے۔ اندر میں ہمارے معروض اولیٰ کیا
 (۱) یہ کہ سائل مبلغ تارقدہ وزیرستان میں ریکورڈ پولیس میں بطور نائب OASI اپنی سرانجام دے رہا تھا۔
 (۲) یہ کہ سائل سلیکشن بورڈ نے ETEA کے ذریعے کو ایڈوائسڈ ایگروان کے سلیکشن کیلئے ہر ایک مبلغ سے اپنا رجسٹر OASI کو بھی طلب کر لیا
 تھا تا کہ سلیکشن پراسس کو شفاف بنایا جاسکے۔ لیکن اپنا رجسٹر بروز کارروائی جمعی ہونے پر من سائل کو بھیج دیا گیا۔ جو کہ اسرارن بالا کو حکم کی
 تعمیل کرنے سے روکے۔ ریجنل سلیکشن کمیٹی میں شامل ہوا۔

(۳) یہ کہ ریجنل سلیکشن بورڈ کی سفارشات کی روشنی میں کل 15 ایگروان کو ایڈوائسڈ ہو کر جن کی بحوالہ آرڈر ایک نمبر 1275 مورخہ
 07.08.2023 کا آرڈر جاری ہو کر تمام Concerned Dealing Hand کارروائی کر دی۔ کاپی ہمراہ لفڈ قابل ملاحظہ ہے۔
 (۴) یہ کہ بلا 15 ایگروان کی شناختی کارڈ ڈرا آؤس اور کرکٹور اور سلیکشن بذریعہ IAGO سب مل برائے کر دی گئی۔ نقل ہمراہ لفڈ قابل ملاحظہ

(۵) یہ کہ بعد از ضروری کارروائی جملہ ایگروانوں کی سروس بک بھی پوزیشن غنواور نتر SRC بلڈج سے Pay برائے ارسال ہوئی ہے۔ جو کہ
 بددوران انکو اتیری دیئے گئے ہیں تا اپنا رجسٹر SRC برائے ارسال اور PAY آفیسر سے روز روشن کی طرح میاں ہے۔
 (۶) یہ کہ انکو اتیری کے دوران انکو اتیری آفیسر نے اپنی انکو اتیری کے دوران ہی اپنے رہائے کو ختم کر دیا ہے اور جملہ خاتمی کو کیکر نظر اعماد کیا
 جا کر سائل کو ضرور اٹھایا ہے۔

(۷) یہ کہ دوران انکو اتیری بھی انکو اتیری آفیسر نے من سائل کو کسی قسم کی صفائی کا موقع نہیں دیا اور ایک Re-connected FIR کا
 ذکر کا حوالہ دیکھ کر سائل کو ضرور اٹھایا ہے۔ جو کہ سراسر انسانی ہے۔

(۸) یہ کہ دوران FIR کی اصلاح کے باعث بھی تفصیلی انکو اتیری مکمل ہو کر جو کہ کل 54 مفقات پر مشتمل تھی روج ریز ہو گیا۔ جس میں
 ہر ایک شخص کا مفاد پائے گئے۔ نقل FIR ہمراہ لفڈ ہے۔

(۹) یہ کہ کسی مظلوم شخص یا اشخاص نے بحوالہ آرڈر ایک نمبر 1275 مورخہ 07.08.2023 میں خود ساختہ ترمیم کے کاؤنٹ آفیسر
 ہے۔ جس کا سامنے کاؤنٹ آفیسر کے علاوہ کسی قسم کا کوئی ریکارڈ موجود نہیں ہے۔ سالا تک کاؤنٹ آفیسر کو بھی شامل تفتیش ہونا چاہئے
 کہ کیکر نظر اعماد کیا گیا ہے۔

(۱۰) یہ کہ جناب RPO بنوں ریجن بنوں نے ماتحت پروری کو بائے طاق رکھتے ہوئے مزید قانونی کارروائی مکمل کے بغیر
 نکل پڑا ہے جو کہ اس کا ہے۔ آرڈر لفڈ ایویں پڑا ہے۔

(۱۱) یہ کہ جناب RPO بنوں ریجن بنوں نے بھی من سائل کو کسی قسم کی Self-defence کا موقع نہیں دیا ہے جو کہ
 کے تعلق ہے۔

لہذا استدعا ہے کہ سائل کی گزارشات کو مدنظر رکھتے ہوئے دوبارہ سروس پر بحال کرنے کا حکم صادر فرما کر ماتحت پروری کا ثبوت دیں۔

مورخہ: 06.02.2024

0335-4404402
 0928-311810

عالم شیر خان حویلیا نائب OASI ایڈوائس مبلغ تارقدہ وزیرستان

EX-H. Constable
 [Signature]

From: The District Police Officer,
North Waziristan.

To: The Regional Police Officer,
Banna Region, Banna.

No. 538 /SRC, Dated 13 /01/2024.

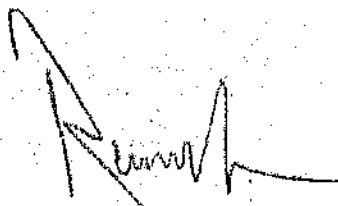
Subject: APPEAL OF EX-HC ALAM SHER KHAN NO. 01

Memo: Kindly refer to your office Endst: No.1049/HC, dated 04.03.2024.
The requisite comments are submitted as under:-

1. That the appellant Ex-HC Alam Sher Khan No.01 was enlisted on 01.08.2019 as Head Constable in this District.
2. That the DPO North Waziristan has issued appointment orders vide Order Endst: No.6025-31/QASI dated 07.08.2023/OB No.1275 dated 07.08.2023 on the same Endst and OB, two order have been issued from his office and in the 2nd Order, Six (06) more candidates appointed as Constables, who have not qualified ETEA and also did not recommended by the Regional Selection Board.
3. That in light of above orders regarding of recruitment of constables preliminary enquiry was conducted and Mr. Aqeeq Hussain SP/Investigation Banna was appointed as enquiry officer.
4. The EO conducted enquiry into the allegations and submitted his findings, wherein he concluded "that this reality cannot be ignored that Pay officer, OASI, SRC branches are the nexus of a chain. All the dealing hands working in a pre-planned manners and no one is deviated from the segment. Moreover, Mr. Jan Muhammad Auditor of the Account Office North Waziristan was also called for recording his written statement but he refused to record written statement and verbally told that the fake/bogus order of 21 constables was brought by the MTO Hassan Yar of North Waziristan Police without producing any evidence. The EO also submitted that as per verbal statement MTO Hassan Yar may be interrogated in the bogus/fake appointment order to highlight the other counterfeiter involved in the practice. The EO has also submitted that the fonts used in original order and subsequent in bogus one are similar and generated from the same computer of OASI branch of the DPO Office, District North Waziristan.
5. That the appellant excluded the name of one Tehsin Ullah from the recruitment recommended by the Regional Selection Board mentioned in the board decision list at S/No. 29 on the basis of statement on affidavit. The appellant should exclude his name from the recruitment of constables on proper office order issued by the DPO concerned with information copies to high-ups but he failed to do so.
6. The appellant was issued show cause notice by the Worthy Regional Police Officer, Banna Region, Banna vide No. 280/PA, dated 14.11.2023 based on finding report of preliminary enquiry submitted by the enquiry officer.
7. The appellant was awarded major punishment of dismissal from service by the Worthy Regional Police Officer, Banna Region, Banna vide order No. 64-66/PA, dated 26.01.2024.

Submitted for favour of dismissal and order, please.

Enclosed: (01) Service roll
(02) Fuji Missal


District Police Officer,
North Waziristan



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by Ex-IC Alam Sher P. No: 00938102. The applicant was dismissed from service by DPO North Waziristan vide Order No. 280/PA, dated 14.11.2023, on the allegation that the DPO North Waziristan has issued appointment orders vide Order Endst: No. 6025-31/OAS, dated 07.08.2023/ OB No. 1275, dated 07.08.2023. On the same Endst: and OB, two orders have been issued from his office and in the 2nd Order, six (06) more candidates appointed as Constables, who have not qualified FITEA and also did not recommend by the Regional Section Board.

The Appellate Authority i.e. RPO Bannu, rejected his appeal vide Order Endst: No. 64-66/PA, dated 26.01.2024

Meeting of Appellate Board was held on 27.06.2024 wherein petitioner was heard in person. The petitioner contended that unknown person(s) sent amended list on the same OB to account branch.

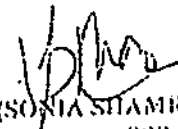
The petitioner was heard in person. The Board by taking lenient view decided that his revision petition is hereby accepted by modifying his major punishment of dismissal from service into minor punishment of forfeiture of one year approved service. He is reinstated into service with immediate effect. The period he remained out of service to be treated as leave without pay.

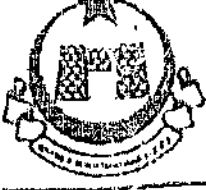
Sd/-
AWAL KHAN, PSP
Additional Inspector General of Police,
HQs: Khyber Pakhtunkhwa, Peshawar.

No. SI 1718-22 /24, dated Peshawar, the 05-07- /2024.

Copy of the above is forwarded to the:

1. Regional Police Office, Bannu. One Service Roll along with Inquiry File (18 pages) of the above named IC received vide your office Memo: No. 1384/IC, dated 23.03.2024 is returned herewith for your office record.
2. District Police Officer North Waziristan.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl: IGP/HQs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQs: Khyber Pakhtunkhwa, Peshawar.


(SONIA SITAMROZ KHAN)
PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.



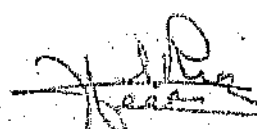
OFFICE OF THE
DISTRICT POLICE OFFICER
NORTH WAZIRISTAN

ORDER

On the recommendation of Regional Selection Board, Bannu Psychology Result Endst: No/1550-51/EC dated 22.05.2023, the following ETEA qualified candidates have been considered suitable for enlistment as constable in District Police North Waziristan on existing vacancies of constables. Therefore, they are hereby enlisted / appointed as constables in District Police of North Waziristan against the vacant posts of constables in DPS-07 @ (16310-910-43610) with immediate effect and allotted constabulary numbers as noted against each.

S/N	Name	Father Name	D.O.B	Height	Chest	CMIC No.	Relt No.
1.	Ahmad Zeb Khan	Hashim Khan	22.12.2000	6-0	34 x 36	21508-2157548-7	3568
2.	Muhammad Navid Khan	Gul-Nawaz Khan	16.08.1997	5-9	33 x 35	11101-5562736-1	3331
3.	Shahid Ayaz	Muhammad Shafi	28.02.2001	5-8	33 1/2 x 35	21506-6494447-1	2669
4.	Eida Muhammad Khan	Muhammad Karim Khan	14.09.1999	5-7	33 x 35	21505-6110494-9	1816
5.	Hurban Ul Din	Eida Zar	01.01.2002	5-9	33 1/2 x 35	21508-8102499-9	2874
6.	Jamshid Khatir	Noor Muhammad	18.01.2000	6-0	35 x 37	21501-7977836-3	1282
7.	Ahmad Solay	Akhtar Salam	07.03.2001	5-11	36 x 37 1/2	21505-9322638-5	2516
8.	Muhammad Rasool	Ayaz Khan	25.06.2000	5-9	33 x 34 1/2	21505-7526746-5	1210
9.	Ishaq Daraz	Noor Daraz	10.03.2001	5-7	33 x 35 1/2	21506-3550384-5	3455
10.	Shahid Ullah	Eid Muhammad Khan	05.03.1997	6-0	34 x 36	21506-6280143-5	2260
11.	Ahmed Noor	Muhammad Ali Khan	07.01.1994	5-8	35 x 37	21506-6876824-9	2454
12.	Zaka Ullah	Taj Gul Khan	03.05.1998	5-8	37 x 38 1/2	21505-2041835-7	1297
13.	Muhammad Zubair	Gul Zary Jan	13.03.1996	6-1	33 x 36	21506-0780863-1	3382
14.	Hakim Ullah	Muhammad Sher Khan	10.07.2002	5-7 1/2	33 x 35	21506-9736795-5	3383
15.	Sadiq Ullah	Abdul Wahab	03.02.2002	5-9	35 x 36 1/2	21506-3506297-3	1680

OB No. 1275
Dated: 07/08/2023.


District Police Officer,
North Waziristan

No. 6025-31 /OASI dated 07/08/2023.

Copy to:

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. The Regional Police Officer, Bannu Region, Bannu w/r quoted above.
3. The District Accounts Officer, North Waziristan.
4. OASI/PO/SRC/Reader for necessary action.

District Police Officer,
North Waziristan

Regional Selection Board Bannu

Total 29 ETEA appeared Candidates from District North Waziristan were called for psychological evaluation and final selection interviews by the Regional Selection Board at Iqbal Shaherd Police Lines Bannu on 18.05.2023 (vide CPO notification No.454/Legal dated 10.02.2023). These candidates were interviewed by Regional Selection Board on 18.05.2023. The Regional Selection Board comprised of the following officers.

- | | | |
|--------------------------------------|--|----------|
| 1. Qasim Ali Khan (PSP) | Regional Police Officer Bannu | Chairman |
| 2. Saleem Riaz | District Police Officer North Waziristan | Member |
| 3. Major @ Mian Muhammad Saleem Shah | Senior Psychologist | Member |

Following recommendation are made: -

Sr. No.	CNIC No	Name	Father Name	District	Psychological Recommendation	Regional Board Recommendation
1.	2150821575487	Ahmad Zeb Khan	Hashim Khan	North Waziristan	Recommended	Recommended
2.	1110155627361	Muhammad Navid Khan	Gul Nawaz Khan	-do-	Recommended	Recommended
3.	2150805066663	Anwar Zeb	Hashim Khan	-do-	Biometric not verified by ETEA/absent (Not Eligible)	Biometric not verified by ETEA/absent (Not Eligible)
4.	2150664944471	Shahid Ayaz	Muhammad Shafi	-do-	Recommended	Recommended
5.	2150662330543	Asad Ullah	Sher Muhammad	-do-	Biometric not verified by ETEA/absent (Not Eligible)	Biometric not verified by ETEA/absent (Not Eligible)
6.	2150159277641	Aslam Nawaz	Noor Shadat Khan	-do-	Under Metric (Not Eligible)	Under Metric (Not Eligible)
7.	1120117025362	Sumera Damsaz	Kashif Rehman	-do-	Biometric not verified by ETEA/absent (Not Eligible)	Biometric not verified by ETEA/absent (Not Eligible)
8.	2150561194949	Fida Muhammad Khan	Muhammad Karim Khan	-do-	Recommended	Recommended
9.	2150881024999	Burhan Udi Din	Eida Zar	-do-	Recommended	Recommended

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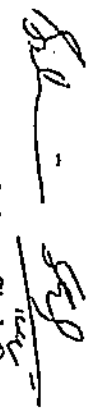
10.	2150166672203	Muhammad Ahmad	Zar Shah Alam Khan	-do-	Biometric not verified by ETEA/absent (Not Eligible)	Biometric not verified by ETEA/absent (Not Eligible)
11.	2150179778363	Jamshed Khan ✓	Noor Muhammad	-do-	Recommended	Recommended
12.	2150699609915	Zafar Ullah	Sabir Khan	-do-	Absent	Absent
13.	2170329050893	Pir Muhammad	Niaz Muhammad	-do-	Biometric not verified by ETEA/absent (Not Eligible)	Biometric not verified by ETEA/absent (Not Eligible)
14.	2150955568761	Rahman din	Lal Badin	-do-	Biometric not verified by ETEA/absent (Not Eligible)	Biometric not verified by ETEA/absent (Not Eligible)
15.	2150593226385	Ahmad Salam ✓	Akhtar Salam	-do-	Recommended	Recommended
16.	2150576267465	Muhammad Rasool ✓	Ayaz Khan	-do-	Recommended	Recommended
17.	2150635503845	Ishaq Daraz ✓	Noor Daraz	-do-	Recommended	Recommended
18.	2150575741531	Waqar Ahmad	Muhammad Amir	-do-	Deficient in Height (Not Eligible)	Deficient in Height (Not Eligible)
19.	2150135355553	Janib Ullah	Noor Janat Gul	-do-	Biometric not verified by ETEA/absent (Not Eligible)	Biometric not verified by ETEA/absent (Not Eligible)
20.	2150602801435	Shahid Ullah ✓	Eid Muhammad Khan	-do-	Recommended	Recommended
21.	2150646480753	Aamir Khan	Noor Zaman	-do-	Biometric not verified by ETEA/absent (Not Eligible)	Biometric not verified by ETEA/absent (Not Eligible)
22.	2150668768249	Ahmad Noor	Muhammad Ali Khan	-do-	Recommended	Recommended
23.	2150520418357	Zaka Ullah	Taj Gul	-do-	Recommended	Recommended
24.	2150855760603	Shoaib Khan	Abdul Ghani	-do-	Biometric not verified by ETEA/absent (Not Eligible)	Biometric not verified by ETEA/absent (Not Eligible)
25.	2150676068615	Pasand Ullah Khan	Abdul Qadir Khan	-do-	Biometric not verified by ETEA/absent (Not Eligible)	Biometric not verified by ETEA/absent (Not Eligible)


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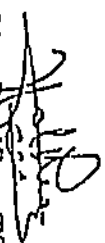
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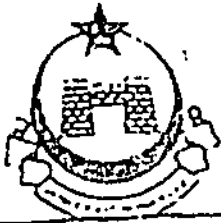
27	2150607808651	Muhammad Zubair ✓	Gul Zari Jan	-do-	Recommended	Recommended
27	2150697357955	Hakim Ullah	Muhammad Sher Khan	-do-	Recommended	Recommended
28	2150633063973	Sadiq Ullah	Abdul Wahab	-do-	Recommended	Recommended
29	2150595454947	Tehsin Ullah	Sher Ghazi Khan	-do-	Recommended	Recommended


 Major Alian Mubammad Saleem Shah
 Senior Psychologist
 Member


 Qasim Ali Khan (ISP)
 Regional Police Officer, Bannu
 Chairman


 Saleem Raza Khan (PSP)
 District Police Officer, North Waziristan
 Member

OFFICE OF THE
DISTRICT POLICE OFFICER
NORTH WAZIRISTAN



No. 3398/OASI
Dated: 06/06/2023.

Phone: 0928-312073
Email: dponwd@gmail.com

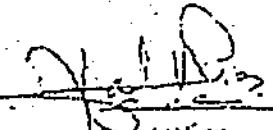
To: The Superintendent of Police,
Special Branch, South Region at Hannu.

Subject: VERIFICATION OF ETEA QUALIFIED CANDIDATES.

Memorandum:

Kindly refer to the subject noted above. It is submitted that the attached verification forms of 16 individuals ETEA qualified candidates as recommended by the Regional Selection Board vide RPO Hannu Ldstr No.1550-517C dated 22/05/2023 are sent herewith for ground check & verification through your good office at earliest and return so as to proceed further in the recruitment process, please.

Your necessary co-operation in this regard will be highly appreciated.


District Police Officer,
North Waziristan

24

AGG/SH/NWTD

20-06-2023

جناب ناٹا

ذرا ال ایگزیکٹو نمبر 3398/0ASI مورم 06-06-2023 ہادیہ جناب (DPC) صاحب شاخ ڈیپارٹمنٹ آف ایڈمنسٹریشن

Subject:

VERIFICATION OF UTEA QUALIFIED CANDIDATES.

پریس میں برقی کونسلرین سبب سلسلہ نمبر

1. ذکا، ایشہ ولد خانگی زمین سکن مید، نیل تحصیل برٹل۔
2. برہان الدین ولد مید، نارا سکن ملک شاہی تحصیل شواہ۔
3. نسیم ایشہ ولد شیر خان سکن ہنزوی تحصیل برٹل۔
4. امیر نور ولد محمد علی خان سکن اوپ نیل تحصیل برٹل۔
5. اسحاق روزا ولد روزا سکن قنبر علی بی نیل تحصیل برٹل۔
6. بشید خان ولد نور محمد کی کہ تحصیل اوپ نیل۔
7. محمد زبیر ولد محمد زبیر سکن ہنزوی تحصیل برٹل۔
8. شاہ ایشہ ولد یحییٰ محمد خان سکن میر کٹ بورہ نیل تحصیل برٹل۔
9. امیر مسعود ولد اختر مسعود سکن میدک تحصیل برٹل۔
10. محمد رسول آباد خان سکن خوشنوی تحصیل برٹل۔
11. محمد نوید خان ولد محمد نور خان سکن حری نیل تحصیل برٹل۔
12. صدیق علی احمد ولد مید، لاراب سکن برٹل تحصیل برٹل۔
13. امیر زبیر خان ولد انیس خان سکن لارہ، سیال آباد نیل تحصیل شواہ۔
14. شاہد آچر ولد محمد علی سکن اوپ نیل تحصیل برٹل۔
15. نسیم ایشہ امیر شیر نوری زمین سکن ماکن تحصیل برٹل۔
16. نور محمد ولد محمد کرم خان سکن میدک کارلی نیل تحصیل برٹل، سرحدی ہون کہ

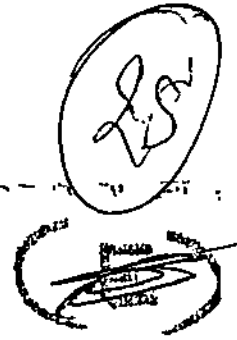
ذرا ال ایگزیکٹو ڈیپارٹمنٹ آف ایڈمنسٹریشن، اطلاعات اوپ نیل کی کمی اور ایڈمنسٹریشن کے متعلق ہے اور ایڈمنسٹریشن کے متعلق ہے۔ کسی کا نام نہ لکھا گیا ہے۔ اسے ڈیپارٹمنٹ آف ایڈمنسٹریشن
ذرا ال ایگزیکٹو ڈیپارٹمنٹ آف ایڈمنسٹریشن۔

امیرت کرادش ہے

AGG/SH/NWTD
Assistant Group Officer
Special Branch
NWTD



OF
DISTRICT POLICE OFFICER
NORTH WAZIRISTAN



No. 4644/SRC
Date: 2.01.2023

Phone: 0928-3120
Email: dponwtd@gmail.com

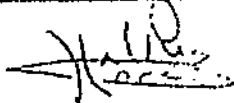
To: The Secretary,
BISE, BANNU.

Subject: VERIFICATION OF DMC/CERTIFICATEs.

Memo: Please refer to the subject noted above.

It is submitted that the below listed individuals have qualified for police service as constables (BPS-07) through ETEA. They have submitted their SSC passed DMCs/Certificates issued by your good office. As per police rules the verification of educational testimonials is the prerequisite. The DMCs/Certificates of the selected individuals are sent herewith for duly verification, whether their DMCs/Certificates are genuine or otherwise?

S.No	Name	Roll No.	DMC/Certificate
1.	Ahmad Zeb Khan	46635	DMC
2.	Muhammad Navid Khan	2903	DMC
3.	Shahid Avaz	58577	DMC
4.	Jamshid Khan	50652	DMC
5.	Ahmad Salam	50941	DMC
6.	Ishaq Daraz	50854	DMC
7.	Shahid Ullah	58336	DMC
8.	Ahmed Noor	38783	DMC
9.	Siddique Ullah	57427	DMC
10.	Muhammad Zubair	46554	DMC
11.	Fida Muhammad Khan	48478	DMC
12.	Burhan Ud Din	57503	DMC
13.	Zaka Ullah	57917	Certificate
14.	Hakim Ullah	45191	Certificate


District Police Officer,
North Waziristan

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OFFICE OF THE
DISTRICT POLICE (C)
NORTH WAZIRISTAN

No. 4430 /SRC
Dated: 16 /06/2023

Phone: 0928-312073
Email: dponwtd@gmail.com

To The Controller BISE,
DI Khan, Board.

Subject: VERIFICATION OF DMC

Memo Please refer to the subject noted above.

It is submitted that Muhammad Rasool s/o Ayaz Khan has been qualified for police service as constables (BPS-07) through ETEA. He has submitted the SSC passed DMC issued by your good office. As per police rules the verification of educational testimonials is the prerequisite. Therefore, his DMC bearing roli.No.46045 along with bank draft is sent herewith for verification that whether his Certificate is Genuine or otherwise?

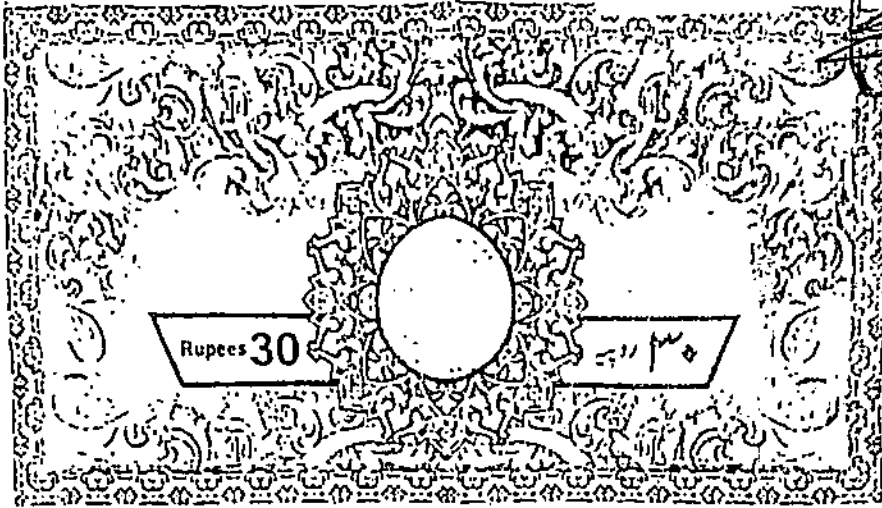
District Police Officer,
North Waziristan



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اقرار نامہ حسین اللہ خالد شیرمائی خان

میں حسین اللہ اقرار کر کے دیا ہے کہ میں پولیس کی نوکری اپنی
صرفی سے چھوڑ رہا ہوں۔ میرا کل گورنمنٹ میں جاب ہوا ہے اسی وجہ
سے میں پولیس کی نوکری نہیں کر سکتا۔

لہذا آپ صحت سے اسکا کہ آپ آگے کا سٹیبل کی کارروائی جاری
کریں۔

بیت مکہ

date = 6/8/2023

File

آپکا فرمانبردار حسین اللہ خالد شیرمائی خان

Nic: 21505-9545494-7

Mob: 6337-6304741

OFFICE OF THE
DIRECTOR GENERAL
OF THE
DAILY SUPPLY

VAKALAT NAMA

NO. _____ /20

IN THE COURT OF KP Service Tribunal, Peshawar.

Alam shor

Appellant
Petitioner
Plaintiff

VERSUS

Police Deptt

Respondent (s)
Defendants (s)

I Alam shor (Appellant) do hereby appoint and constitute the *SYED NOMAN ALI BUKHARI Advocate High Court* for the aforesaid Appellant(s), Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party to commence and prosecute / to appear and defend this action / appeal / petition / reference on my / our behalf and all proceedings that may be taken in respect of any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take documents, to accept the process of the court, to appoint and instruct council, to represent the aforesaid Appellant; Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s); Opposite Party agree(s) ratify all the acts done by the aforesaid.

DATE _____ /20

[Signature]
(CLIENT)

ACCEPTED

[Signature]
SYED NOMAN ALI BUKHARI
ADVOCATE HIGH COURT
BC NO. 15-5643

[Signature]
UZMA SYED
[Signature]