


# FORM OF ORDER SHEET

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

**Appeal No.** 1257/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	4/9/2024	<p>The appeal of Mr. Shakeel Ahmad presented today by Mr. Amin ur Rehman Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 13/9/2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> <b>REGISTRAR</b></p>

The appeal of Shakeel Ahmad, received today i.e. on 23.08.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.


1. Copy of departmental appeal mentioned in the memo of the appeal is not attached with the appeal.

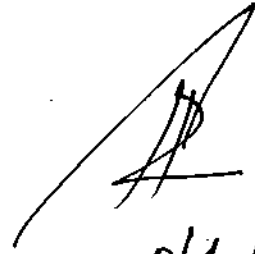
No. 637 /S.T,

Dt. 02/09 /2024

  
ASSISTANT-  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Amin ur Rehman, Adv. Pesh.





04/09/24

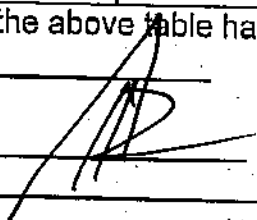
**KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR**  
**CHECK LIST**

Shakil Ahmad Versus  
 ..... Appellant

PRO  
 ..... Respondents

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

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

Name:- \_\_\_\_\_  
 Signature:-   
 Dated:- \_\_\_\_\_

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

1257/2024

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

Shakeel Ahmad, Ex-Foot Constable (FC) Khyber Pakhtunkhwa Police Distt: Khyber. . .Appellant

**VERSUS**

Provincial Police Officer (PPO) Khyber Pakhtunkhwa & others. . . . . Respondents

**INDEX**

S. No.	Description of documents	Annex	Pages
1.	Grounds of Service Appeal		1-3
2.	Affidavit		4
3.	Application for condonation of delay		5
4.	Affidavit		6
5.	Addresses of the parties		7
6.	CNIC	A	8
7.	Service Card	B	9
8.	Last posting order dated: 14.04.2023	C	10
9.	Absorption Notification dated: 13.02.2020	D	11-14
10.	Police Training Certificate dated: 10.06.2022	E	15
11.	Major Seizure Reports dated: 24.01.2017, 06.12.2017, 06.02.2018 & 05.01.2019	F -- F/3	16-19
12.	Commendation certificates dated: 12.01.2016, 02.06.2016, 11.01.2017 & 01.02.2017	G--G/3	20-23
13.	Salary slips for the months of February, March & April 2023	H--H/2	24-26
14.	Dismissal from service Order dated: 25.05.2023	I	27
15.	Order dated: 04.07.2023 of Appellate Authority / Respondent No:2	J	28-29
16.	Order dated: 06.08.2024 of Respondent No.1/IGP alongwith Revision Petition dated: 25.07.2023	K	30-31
17.	Suspension Order No.2508/PA-DPO Khyber, dated: 20.04.2023	L	32
18.	Wakalatnama		33

*Shakeel Ahmad*

APPELLANT

Through

Amin ur Rehman Yusufzai

*Khalid Khan Mehmood*  
Khalid Khan Mehmood

*Muaz Ashraf Khalil*  
Muaz Ashraf Khalil

&

*Shams ur Rahman*  
Shams ur Rahman

Advocates, Peshawar  
3-A, Park Avenue, Bethani Plaza,  
University Town, Peshawar

Cell No.0321-9022964, 0342-9101124

Dated: 22.08.2024

①

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

1257/24

Khyber Pakhtunkhwa  
Service Appeal No. 15168/2024

Diary No. 15168

Dated 23/8/24  
Appellant

Shakeel Ahmad S/O Malik Muhammad Hassan  
Ex-Foot Constable (FC) Khyber Pakhtunkhwa Police District Khyber.  
R/O Zakha Khel, Wali Baig Khel, PO & Tehsil Landi Kotal District Khyber.

**VERSUS**

1. Provincial Police Officer (PPO) Khyber Pakhtunkhwa, Central Police Office (CPO), Peshawar.
2. Capital City Police Officer (CCPO) Police Lines, Peshawar.
3. District Police Officer (DPO), Khyber at Shahkas. .... Respondents

⇄⇄⇄⇄⇄⇄⇄⇄⇄⇄⇄⇄⇄⇄

**SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974, READ WITH ALL ENABLING PROVISIONS OF LAW, GOVERNING THE SUBJECT, AGAINST:**

- i. Order No.3402/PA-DPO Khyber, dated: 25.05.2023 of Respondent No.3, vide which major penalty of dismissal from service was imposed upon Appellant.
- ii. Order No.2425-29/PA, dated: 04.07.2023 of Respondent No.2, vide which Departmental Appeal of Appellant was rejected, and
- iii. Order No.S/1930-34/24 dated: 06.08.2024 of Respondent No.1, vide which Revision Petition dated: 25.07.2023 of Appellant was rejected.

**PRAYER-IN-APPEAL:**

On acceptance of instant Service Appeal, impugned Orders dated: 25.05.2023 (Of Respondent No.3), 04.07.2023 (of Respondent No.2) and 06.08.2024 (of Respondent No.1), alongwith pre/post proceedings thereto, may be set aside and Respondent Department may be directed to reinstate Appellant in Service with all consequential benefits.

⇄⇄⇄⇄⇄⇄⇄⇄⇄⇄⇄⇄⇄⇄

**Respectfully Sheweth:**

1. That appellant is law abiding peaceful citizen of Pakistan and permanent resident of District Khyber.
2. That appellant, being qualified, was enlisted as Khassadar, in erstwhile Khyber Khasadar Force, by the Competent Authority, vide order dated: 05.07.2013.
3. That, on the strength of excellent performance, appellant was absorbed in the Khyber Pakhtunkhwa Police, vide Notification No. SO(Police)HD/SMY 2019 Merged Area/373-83, dated: 13.02.2020 (at Serial No.1861). He gone through mandatory police training successfully and always performed professional duties with zeal, devotion and utmost satisfaction of the superiors, which has always been appreciated/applauded by the Respondent Department.

**(Copies of:**

- i. CNIC (Annexure-A)
- ii. Service Card (Annexure-B)
- iii. Last posting order dated: 14.04.2023 (Annexure-C)
- iv. Absorption Notification dated: 13.02.2020 (Annexure-D)
- v. Police training certificate dated: 10.06.2022 (Annexure-E)
- vi. Major seizure reports dated: 24.01.2017, 06.12.2017, 06.02.2018 & 05.01.2019 (Annexures F, F/1, F/2 & F/3 respectively)

Filed to-day  
Registrar  
23/8/24

Re-submitted to-day  
and filed.  
Registrar  
23/8/24

(3)

- vii. Commendation certificates dated: 12.01.2016, 02.06.2016, 11.01.2017 & 01.02.2017 (Annexures G, G/1, G/2 & G/3 respectively)
- viii. Salary slips for the months of February, March & April 2023 (Annexures H, H/1 & H/2 respectively)
4. That appellant has unilaterally been dismissed from service, by Respondent No.3, vide Order No.3402/PA-DPO Khyber, dated: 25.05.2023, without either conducting regular inquiry into his guilt or providing him opportunity of proper hearing.  
**(Copy of dismissal from service Order dated: 25.05.2023 is attached as Annexure "I")**
5. That Appellant approached Respondent No.2/Appellate Authority, through Departmental Appeal dated: 08.06.2023, however, rejected vide Order No.2425-29/ PA, dated: 04.07.2023.  
**(Copy of Order dated: 04.07.2023 of the Appellate Authority / Respondent No.2 is attached as Annexure "J")**
6. That Appellant approached Respondent No.1/IGP Khyber Pakhtunkhwa through Revision Petition, dated: 25.07.2023, which too met the same fate and rejected, vide Order No.S/1930-34/24, dated: 06.08.2024.  
**(Copy of Order dated: 06.08.2024 of Respondent No.1/IGP alongwith Revision Petition dated: 25.07.2023 is attached as Annexure "K")**
7. That appellant being aggrieved of:
- i. **Order No.3402/PA-DPO Khyber, dated: 25.05.2023 of Respondent No.3, vide which major penalty of dismissal from service was imposed upon Appellant.**
  - ii. **Order No.2425-29/PA, dated: 04.07.2023 of Respondent No.2, vide which Departmental Appeal of Appellant was rejected, and**
  - iii. **Order No.S/1930-34/24 dated: 06.08.2024 of Respondent No.1, vide which Revision Petition dated: 25.07.2023 of Appellant was rejected.**

And having no other efficacious and alternate remedy, approaches this Hon'ble Tribunal, inter-alia, on the following grounds:

### **GRUNDS:**

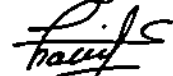
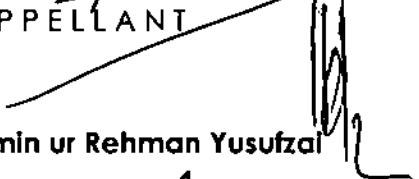


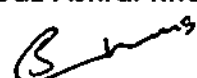
- A. That impugned Orders, dated: 25.05.2023, 04.07.2023 & 06.08.2024 of Respondents No.3, 2 & 1 respectively, are against the law, facts and material available on file, hence untenable.
- B. That Appellant has been shunt-out from service in utter disregard to law/rules governing the subject, which has caused grave miscarriage of justice.
- C. That impugned orders have been passed in surmises and conjectures, without application of legal mind, hence Respondents No.1, 2 & 3 arrived at a wrong conclusion.
- D. That more than 11 years spotless service of Appellant has been done away under the garb of baseless allegations of his involvement in alleged illegal extortion of deployment of civilian persons as Police Officials in Torkham Area, without either conducting regular inquiry into his guilt or confronting him with the so-called incriminating evidence/material, available with the department against appellant or providing him opportunity of hearing, hence the impugned orders carry no legal weight.
- E. That appellant has neither been treated in accordance with law nor extended him equal protection of law, enshrined in Articles 4 & 10-A of the Constitution of Islamic Republic of Pakistan, 1973.

(3)

- F. That minute perusal of the impugned orders would show that major penalty of dismissal from service was imposed upon appellant, without providing him either opportunity of hearing, issuance of charge sheet / statement of allegations, Show Cause Notice and Final Show Cause Notice, hence has been condemned unheard, which attracts the doctrine of *audi alteram partem*.
- G. That Respondent No.3/DPO Khyber suspended appellant and his salary was stopped, vide Order No.2508/PA-DPO Khyber, dated: 20.04.2023, with reference to case FIR No.87, dated: 19.04.2023, registered at Police Station Landi Kotal against the civilians who were personating as Police Officials, however, after probing into the matter, appellant was subsequently proved innocent thus exonerated, evident from salary slip for the month of April 2023 (already annexed as H/2), but astonishingly this factum has deliberately been suppressed by Respondent No.3, while issuing impugned order dated: 25.05.2023, which speaks volumes of malafide on his part.  
(Copy of Suspension Order No.2508/PA-DPO Khyber, dated: 20.04.2023 is attached as Annexure "L")
- H. That any other ground, with the permission of this Hon'ble Tribunal, will be taken at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of instant Service Appeal, impugned Orders dated: 25.05.2023 (Of Respondent No.3), 04.07.2023 (of Respondent No.2) and 06.08.2024 (of Respondent No.1), alongwith pre/post proceedings thereto, may be set aside and Respondent Department may be directed to reinstate Appellant in Service with all consequential benefits.


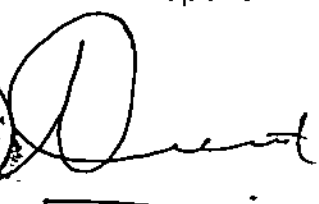
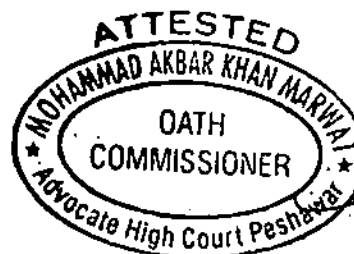
Any other relief, not specifically prayed for and deemed appropriate by this Hon'ble Tribunal in circumstances of the case, may also be granted.

  
APPELLANT  
Through  
  
Amin ur Rehman Yusufzai  
  
Khalid Khan Mohmand  
  
Muaz Ashraf Khalil  
&  
  
Shams ur Rahman  
Advocates, Peshawar  
3-A, Park Avenue, Bethani Plaza,  
University Town, Peshawar  
Cell No.0321-9022964, 0342-9101124

Dated: 22.08.2024

**VERIFICATION:**

Verified on oath that the content of the instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.

  
Deponent  
  
  
ATTESTED  
MOHAMMAD AKBAR KHAN MARWAT  
OATH  
COMMISSIONER  
Advocate High Court Peshawar

22-08-2024

Yusufzai Law Chamber

4

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

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

Shakeel Ahmad, Ex-Foot Constable (FC) Khyber Pakhtunkhwa Police Distt: Khyber. . . **Appellant**

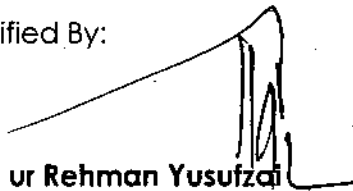
**VERSUS**

Provincial Police Officer (PPO) Khyber Pakhtunkhwa & others. . . . . **Respondents**

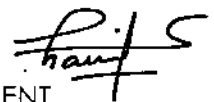
**AFFIDAVIT**

I, Shakeel Ahmad S/O Malik Muhammad Hassan Ex-Foot Constable (FC) Khyber Pakhtunkhwa Police District Khyber R/O Zakha Khel, Wali Baig Khel, PO & Tehsil Landi Kotal District Khyber, do hereby solemnly affirm declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge, belief and nothing has been kept concealed from this Hon'ble Tribunal.

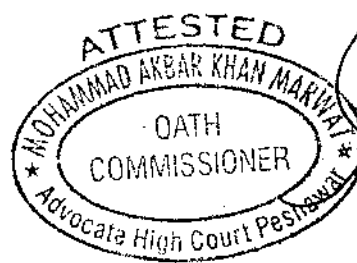
Identified By:



**Amin ur Rehman Yusufzai**  
Advocate, Peshawar



DEPONENT  
CNIC #: 21203-4983489-5  
Cell: 0300-4646237



22-08-2024



5

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

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

Shakeel Ahmad, Ex-Foot Constable (FC) Khyber Pakhtunkhwa Police Distt: Khyber. . . **Appellant**

**VERSUS**

Provincial Police Officer (PPO) Khyber Pakhtunkhwa & others. . . . . **Respondents**

**ADDRESSES OF THE PARTIES**

**APPELLANT:**

Shakeel Ahmad S/O Malik Muhammad Hassan  
Ex-Foot Constable (FC) Khyber Pakhtunkhwa Police District Khyber.  
R/O Zakha Khel, Wali Baig Khel, PO & Tehsil Landi Kotal District Khyber

**RESPONDENTS:**


1. Provincial Police Officer (PPO) Khyber Pakhtunkhwa, Central Police Office (CPO), Peshawar.
2. Capital City Police Officer (CCPO) Police Lines, Peshawar.
3. District Police Officer (DPO), Khyber at Shahkas.



APPELLANT


Through

  
Amin ur Rehman Yusufzai

  
Khalid Khan Mohmand

  
Muaz Ashraf Khatt

&

  
Shams ur Rahman  
Advocates, Peshawar  
3-A, Park Avenue, Bethani Plaza,  
University Town, Peshawar.  
Cell No.0321-9022964, 0342-9101124

Dated: 22.08.2024

6

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

Civil Misc. No. \_\_\_\_\_ of 2024  
I N  
Service Appeal No. \_\_\_\_/2024

Shakeel Ahmad, Ex-Foot Constable (FC) Khyber Pakhtunkhwa Police Distt: Khyber. . . **Appellant**

**VERSUS**

Provincial Police Officer (PPO) Khyber Pakhtunkhwa & others. . . . . **Respondents**

**APPLICATION FOR CONDONATION OF DELAY, IF ANY.**

**Respectfully Sheweth:**

1. That the titled Appeal has been filed today before this Hon'ble Tribunal wherein no date of hearing has yet been fixed for onward proceedings.
2. That facts and grounds of the titled appeal may please be considered as integral part and parcel of instant application.
3. That delay, if any, in filing of the titled appeal, is not deliberate rather occasioned inadvertently, hence the instant application.
4. That valuable rights' of appellant/applicant are involved into the matter and the delay, if any, if not condoned, he will suffer irreparable loss.
5. That applicant/appellant has got good prima facie case in his favour and is very much sanguine of its success. Moreover, balance of convenience also lies in his favour.

It is, therefore, most humbly prayed that on acceptance of instant application, condonation of delay, if any, in filing of the titled appeal is occasioned, the same may be condoned, in the best of interest of justice and equity.

  
APPELLANT

Through

  
Amin ur Rehman Yusufzai

  
Khalid Khan Mohmand

  
Muaz Ashraf Khalil

&

  
Shams ur Rahman  
Advocates, Peshawar

Dated: 22.08.2024

7

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

Civil Misc. No. \_\_\_\_\_ of 2024  
I N  
Service Appeal No. \_\_\_\_/2024

Shakeel Ahmad, Ex-Foot Constable (FC) Khyber Pakhtunkhwa Police Distt: Khyber. . . **Appellant**

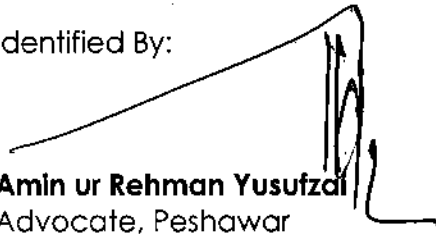
**VERSUS**

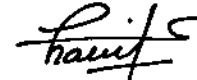
Provincial Police Officer (PPO) Khyber Pakhtunkhwa & others. . . . . **Respondents**

**AFFIDAVIT**

I, Shakeel Ahmad S/O Malik Muhammad Hassan Ex-Foot Constable (FC) Khyber Pakhtunkhwa Police District Khyber R/O Zakha Khel, Wali Baig Khel, PO & Tehsil Landi Kotal District Khyber, do hereby solemnly affirm declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge, belief and nothing has been kept concealed from this Hon'ble Tribunal.

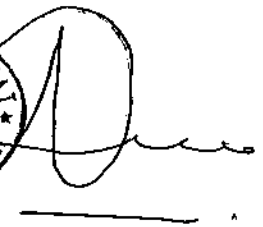
Identified By:

  
**Amin ur Rehman Yusufzai**  
Advocate, Peshawar



DEPONENT  
CNIC #: 21203-4983489-5  
Cell: 0300-4646237

**ATTESTED**  
**MOHAMMAD AKBAR KHAN MARWAT**  
OATH  
COMMISSIONER  
Advocate High Court Peshawar



22-08-2024

Annex "A"

(8)

**PAKISTAN** National Identity Card  
ISLAMIC REPUBLIC OF PAKISTAN

Name  
Shakil Ahmad

Father Name  
Malak Muhammad Hassan

Gender: M Country of Stay: Pakistan

Identity Number: 21203-4983489-5 Date of Birth: 22.07.1985

Date of Issue: 12.08.2020 Date of Expiry: 12.08.2030

Holder's Signature

21203-4983489-5

گمشدہ کارڈ ملنے پر تقریبی لیٹر بکس میں ڈال دیں


10146115140  
140-83-221100

Attested to be true  
Copy


Annex "B"  
⑨

**Khyber Pakhtunkhwa Police**

Card No. 0119632



**SHAKIL AHMAD**  
Constable



Issuing Authority

**District Police Office Khyber**

CNIC # 2120349834895

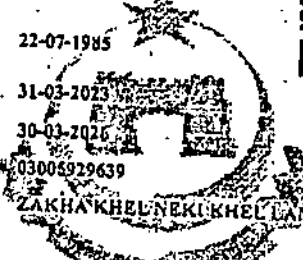

Date of Birth 22-07-1985

Date of Issue 31-03-2023

Date of Expiry 30-03-2026

Emergency Contact: 03004929639

Address ZAKHAKHEL NEKUKHEL LANDI KOTAL Khyber



1. In the event of loss the card holder should report to the nearest police station.  
2. If found, please drop into the nearest letter box.  
3. Contact us: 031-9210457

Attested to be true  
*[Signature]*  
Copy



Annex D

11

**GOVERNMENT OF THE KHYBER PAKHTUNKHWA  
HOME AND TRIBAL AFFAIRS DEPARTMENT.**

**NOTIFICATION**

Peshawar dated the, 13/2/2020

No.SO(Police)HD/SMY 2019 Merged Area/ 373-83 In pursuance of the provisions contained in section 5 of the Khyber Pakhtunkhwa Khasadars Force Act, 2019 (Khyber Pakhtunkhwa Act No.XXXIV of 2019) read with rule 3 of the Khasadar Force (Absorption in the Khyber Pakhtunkhwa Police) Rules, 2019, the Home and Tribal Affairs Department, with the prior approval of the Cabinet and on the recommendation of the Provincial Police Officer, hereby orders absorption of the following members of Khasadars Force of Khyber Tribal District in the Khyber Pakhtunkhwa Police with effect from the date of the initial appointment of the said members:

S.#	Name	Father's Name	Previous Rank	Rank in which Absorbed
1.	Muhammad Nawaz	Khiul Akbar	Subedar Major (BS-7)	Inspector (BS-16)
2.	Hikmat Khan ✓	Bati Khan	Subedar (BS-5)	SI (BS-14)
3.	Javed Khan	Arbab Khan	Subedar (BS-5)	SI (BS-14)
4.	Said Khan	Habibur Rehman	Subedar (BS-5)	SI (BS-14)
5.	Muhammad Azeem	Mulraban Shah	Subedar (BS-5)	SI (BS-14)
6.	Lawar Khan	Widan Shah	Subedar (BS-5)	SI (BS-14)
7.	Tazu Khan	Juno Gul	Subedar (BS-5)	SI (BS-14)
8.	Lal Jan	Muhammad Ayub	Subedar (BS-5)	SI (BS-14)
9.	Mazhar Khan	Malik Waris Khan	Subedar (BS-5)	SI (BS-14)
10.	Amjad Khan	H.M.Arif	Subedar (BS-5)	SI (BS-14)
11.	Suced Khan No. 01	Arsala Khan	Subedar (BS-5)	SI (BS-14)
12.	Muhammad Younis	M/Z Inayat Khan	Subedar (BS-5)	SI (BS-14)
13.	Shamshad Khan	Sultan Khel	Subedar (BS-5)	SI (BS-14) ✓
14.	Sabirullah	Lal Afzal	Subedar (BS-5)	SI (BS-14)
15.	Gul, Mar Khan No. 01	Rehmat Gul	Subedar (BS-5)	SI (BS-14)
16.	Andaz Gul	Sarwar Jan	Subedar (BS-5)	SI (BS-14)
17.	Abdul Hussain	Mir Hussain	N/Subedar (BS-4)	ASI (BS-11)
18.	Tariq Meharoud	Khadim Khan	N/Subedar (BS-4)	ASI (BS-11)
19.	Ikram Shah	Aurang Zeb	N/Subedar (BS-4)	ASI (BS-11)
20.	Hardam Gul	Sahar Gul	N/Subedar (BS-4)	ASI (BS-11)
21.	Naushad Ali	Abdul Qayum	N/Subedar (BS-4)	ASI (BS-11)
22.	Muhammad Atif	Muhammad Akbar	N/Subedar (BS-4)	ASI (BS-11)

Attested to be true  
Copy

Attested to be true  
Copy

19

S.#	Name	Father's Name	Previous Rank	Rank in which Absorbed
1861.	Shakeel Ahmad	Muhammad Hassan	Sepoy (BS-01)	Constable (BS-07)
1862.	Farhad Ali	Mahboob Ali	Sepoy (BS-01)	Constable (BS-07)
1863.	Amin Gul	Taj Akbar	Sepoy (BS-01)	Constable (BS-07)
1864.	Muhammad Ijaz	Kohe Daman	Sepoy (BS-01)	Constable (BS-07)
1865.	Yasir Khan	Abdur Rahim	Sepoy (BS-01)	Constable (BS-07)
1866.	Ihsanullah	Amanullah	Sepoy (BS-01)	Constable (BS-07)
1867.	Amir No. 02	Fida Hussain	Sepoy (BS-01)	Constable (BS-07)
1868.	Daud Khan	Robia Khel	Sepoy (BS-01)	Constable (BS-07)
1869.	Zar Kaleem	Alan Shah	Sepoy (BS-01)	Constable (BS-07)
1870.	Islamabad	Khan Jalal	Sepoy (BS-01)	Constable (BS-07)
1871.	Gul Nawaz	Hakeemullah	Sepoy (BS-01)	Constable (BS-07)
1872.	Habib Jan	Wasela Jan	Sepoy (BS-01)	Constable (BS-07)
1873.	Raheem Jan	Nasra Din	Sepoy (BS-01)	Constable (BS-07)
1874.	Jan Muhammad	Akhtar Muhammad	Sepoy (BS-01)	Constable (BS-07)
1875.	Muhammad Shafique	Arbab Khan	Sepoy (BS-01)	Constable (BS-07)
1876.	Muhammad Amin	Sahib Khan	Sepoy (BS-01)	Constable (BS-07)
1877.	Asif Khan	Badam Khan	Sepoy (BS-01)	Constable (BS-07)
1878.	Dostam	Fazal Jan	Sepoy (BS-01)	Constable (BS-07)
1879.	Muhammad Sohail	Essa Khan	Sepoy (BS-01)	Constable (BS-07)
1880.	Javed Khan	Abdul Ma Jan	Sepoy (BS-01)	Constable (BS-07)
1881.	Shah Akbar	Khana Meer	Sepoy (BS-01)	Constable (BS-07)
1882.	Muhammada Jan	Alif Gul	Sepoy (BS-01)	Constable (BS-07)
1883.	Naseeb Ghani	Fazal Rabi	Sepoy (BS-01)	Constable (BS-07)
1884.	Arif	Sarfaz	Sepoy (BS-01)	Constable (BS-07)
1885.	Rahid Gul	Samir Gul	Sepoy (BS-01)	Constable (BS-07)
1886.	Rehima Zada	Fazal Kamal	Sepoy (BS-01)	Constable (BS-07)
1887.	Sanaullah	Mustafa Jan	Sepoy (BS-01)	Constable (BS-07)
1888.	Rehmat Ali	Nadar Khan	Sepoy (BS-01)	Constable (BS-07)
1889.	Muhammad Javed	Mirbat Khan	Sepoy (BS-01)	Constable (BS-07)
1890.	Muhammad Shafique	Sher Azam	Sepoy (BS-01)	Constable (BS-07)
1891.	Shah Khalid	Surat Shah	Sepoy (BS-01)	Constable (BS-07)
1892.	Jan Wali	Mina Gul	Sepoy (BS-01)	Constable (BS-07)
1893.	Raqeebullah	Najaur Khan	Sepoy (BS-01)	Constable (BS-07)
1894.	Obaid Wali	Zafar Khan	Sepoy (BS-01)	Constable (BS-07)
1895.	Abdul Wahid Khan	Abid Khan	Sepoy (BS-01)	Constable (BS-07)
1896.	Yousaf	Shuja Malik	Sepoy (BS-01)	Constable (BS-07)
1897.	Zaitullah	Ohabin Gul	Sepoy (BS-01)	Constable (BS-07)
1898.	Ashfaq Ahmad	Zinat Khan	Sepoy (BS-01)	Constable (BS-07)
1899.	Jan Wali	Shanik	Sepoy (BS-01)	Constable (BS-07)
1900.	Akbar Gul	Khana Gul	Sepoy (BS-01)	Constable (BS-07)
1901.	Bakhta Jan	Ahmad Jan	Sepoy (BS-01)	Constable (BS-07)
1902.	Shah Iran Khan	Feroz Khan	Sepoy (BS-01)	Constable (BS-07)
1903.	Hamidullah	Sawat Khan	Sepoy (BS-01)	Constable (BS-07)
1904.	Qudratullah No. 03	Raza Ullah	Sepoy (BS-01)	Constable (BS-07)
1905.	Muhammad Khalid	Tuza Khan	Sepoy (BS-01)	Constable (BS-07)
1906.	Waqas	Jhangir Khan	Sepoy (BS-01)	Constable (BS-07)

Attested by [Signature]

Date: 01/05/2022

Attested to be true copy



S.#	Name	Father's Name	Previous Rank	Rank in which Absorbed
2522.	Muhammad Tariq	Sher Zaman	Sepoy (BS-01)	Constable (BS-07)
2523.	Haji Wall	Jelal Shah	Sepoy (BS-01)	Constable (BS-07)
2524.	Muhammad Amir Khan	Raja Khan	Sepoy (BS-01)	Constable (BS-07)
2525.	Sajid Khan	Wilayat Khan	Sepoy (BS-01)	Constable (BS-07)
2526.	Awalbat Khan	Muhabat Khan	Sepoy (BS-01)	Constable (BS-07)
2527.	HabiburRehman	Raheem Shah	Sepoy (BS-01)	Constable (BS-07)
2528.	Shahid Ullah	FatehulMulk	Sepoy (BS-01)	Constable (BS-07)
2529.	Ijaz Ullah	Maloom Khan Afridi	Sepoy (BS-01)	Constable (BS-07)
2530.	Tariq Khan	Saleem Khan	Sepoy (BS-01)	Constable (BS-07)
2531.	Fazal Amin	Muhammad Alam	Sepoy (BS-01)	Constable (BS-07)
2532.	Amjad Ali	Sharab Khan	Sepoy (BS-01)	Constable (BS-07)
2533.	Afsar Ali	Muhammad Abbas	Sepoy (BS-01)	Constable (BS-07)
2534.	Saif Muhammad	Muhammad Khan	Sepoy (BS-01)	Constable (BS-07)
2535.	Sajid Ahmad	Babu Khan	Sepoy (BS-01)	Constable (BS-07)
2536.	Zahid Ullah	Khana Gul	Sepoy (BS-01)	Constable (BS-07)
2537.	Zar Ghamin	Shameen Khan	Sepoy (BS-01)	Constable (BS-07)
2538.	Alab Khan	Hawas Khan	Sepoy (BS-01)	Constable (BS-07)
2539.	Anwar Khan	Khan Sald	Sepoy (BS-01)	Constable (BS-07)
2540.	Rab Dinar	Minar Khel	Sepoy (BS-01)	Constable (BS-07)
2541.	Iftikhar Ahmad	Mir Ahmad	Sepoy (BS-01)	Constable (BS-07)
2542.	Adeel Haider	Noor Halder	Sepoy (BS-01)	Constable (BS-07)
2543.	Khan Nawaz	Lala Jan	Sepoy (BS-01)	Constable (BS-07)
2544.	Sohail Khan Afridi	Tahir Muhammad	Sepoy (BS-01)	Constable (BS-07)
2545.	Waleed Afridi	Saleem Javed	Sepoy (BS-01)	Constable (BS-07)
2546.	Muhammad Shakeel	Khushal Khan	Sepoy (BS-01)	Constable (BS-07)
2547.	Imtiaz Ali	Minar Gul	Sepoy (BS-01)	Constable (BS-07)
2548.	Rehmat Khan	SaifurRehman	Sepoy (BS-01)	Constable (BS-07)
2549.	Asim Khan	Ferid Ullah	Sepoy (BS-01)	Constable (BS-07)
2550.	Samandar Khan	Akhtar Shah	Sepoy (BS-01)	Constable (BS-07)
2551.	Niaz Muhammad	Mehraban Shah	Sepoy (BS-01)	Constable (BS-07)
2552.	SaddiqueurRehman	Zari Shah	Sepoy (BS-01)	Constable (BS-07)
2553.	Said Nawaz	Gul Bahadar	Sepoy (BS-01)	Constable (BS-07)

2. The above absorption shall be subject to the following terms and conditions:

- (i) Their services shall be governed under the Khyber Pakhtunkhwa Police Act, 2017 and the rules made thereunder.
- (ii) A member shall not be entitled for absorption, if he has resigned from Khasadar Force Service or has been terminated from the Service Ibid on account of misconduct, inefficiency or any other grounds or has been retired from Service under the Khyber Khasadars Rules-1950 and Khasadars Service Rules-2011, before commencement of the Khyber Pakhtunkhwa Khasadars Force Act, 2019 (Khyber Pakhtunkhwa Act No. XXXIV of 2019).

ATTESTED  
 attested to be true  
 Copy

Attested to be true  
 Copy

- (iii) Their services shall be considered regular and they shall be eligible for pension and deduction of General Provident fund in terms of the Khyber Pakhtunkhwa Civil Servant Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973).
- (iv) Their seniority shall be determined in accordance with rule 6 of the Khasadars Force (Absorption in Khyber Pakhtunkhwa Police) Rules 2019.
- (v) They shall undergo training as provided in rule 5 of Khasadars Force (Absorption in Khyber Pakhtunkhwa Police) Rules, 2019.

**Secretary**  
to Government of the Khyber Pakhtunkhwa  
Home and Tribal Affairs Department

No. & date even.  
CC to:

- 1. Inspector General of Police, Khyber Pakhtunkhwa.
- 2. Accountant General Khyber Pakhtunkhwa.
- 3. Regional Police Officer, Peshawar
- 4. District Police Officer Khyber Tribal District.
- 5. Deputy Commissioner Khyber Tribal District
- 6. PS to Chief Secretary Government of Khyber Pakhtunkhwa
- 7. PS to Secretary, Home & TAs Department, Khyber Pakhtunkhwa.
- 8. PS to Special Secretary-II, Home & TAs Department, Khyber Pakhtunkhwa.
- 9. PS to Secretary, Establishment Department, Khyber Pakhtunkhwa
- 10. Manager Printing Press for notifying the same in the official gazette.
- 11. Office record file.

Section Officer (Levies & Khasadars)

Attested to be true  
Copy

Attested to be true  
ATTESTED  
Copy



# POLICE TRAINING SCHOOL

## SHAKAS KHYBER



Reg: No C-244

### COURSE COMPLETION CERTIFICATE

Police Training (Newly Absorbed Strength Ex-NMDs)

*This is to certified that*

B. No 2617

Mr. SHAKIL AHMAD S/O Malak Muhammad Hassan District KHYBER

**HAS PARTICIPATED AND SUCCESSFULLY COMPLETED  
THREE MONTHS BASIC POLICE TRAINING**

From 11-03-2022 to 10-06-2022

  
Director Police Training School  
Shakas Khyber

Attested to be true  
Copy

Annex E 15

Answer "F"

(16)

No 414 /NTP-TKM Dated Torkham the 24-01-2017.

From The Naib Tehsildar Passport,  
Torkham.

To The Assistant Political Agent,  
Landikotal.

Subject: SEIZURE OF HASHISH - - - COMMENDATION  
CERTIFICATE.



Memorandum.

In continuation of this office memo No. 397-99 dated  
23-01-2017,

The following team headed by the undersigned, have  
played a good role in recovery of 16 Kgs of Hashish from the loaded truck at  
Torkham:-

1. Ali Raza PM Torkham
2. Waqar Ahmad Khalil PM Torkham
3. N/S Noor Zeb PZK.
4. Khassadar: Khyal Muhammad PZK
5. Khassadar: Shakeel PZK.

In order to encourage the above team, it is therefore requested  
that the staff may kindly be awarded with cash and commendation certificates to  
work with more zeal and interest, please.

  
Naib Tehsildar Passports, Torkham  


Attested to be true  
Copy

F 1

No 4976 /NTP-TKM Dated Torkham the 06 -12-2017:

(17)

From The Naib Tehsildar Passport,  
Torkham.

To The Assistant Political Agent,  
Landikotal.

Subject: SEIZURE OF HASHISH AND HEROINE . . .  
COMMENDATION CERTIFICATE.

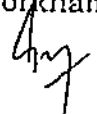
Memorandum.

In continuation of this office memo No. 4973-78/NTP-TKM dated 06-12-2017.

The following team headed by the undersigned, have played a good role in recovery of 181 packets of Hashish and 13 packets of Heroine from a truck at Torkham:-

1. Ali Raza PM Torkham
2. Waqar Ahmad Khalil PM Torkham
3. Subedar Safer Ullah Shinwari
4. Havaladar Rehman ud Din Shinwari
5. Khassadar Shakeel Ahmad Pakhai Zakha Khel
6. Khassadar Muhammad Ayaz Shinwari
7. Shah Wali (Jar Laborer Torkham)

In order to encourage the above team, it is therefore requested that Official on S. No 1 to 3 and 7 for cash award and commendation certificates while S. No. 4 to 6 are recommended for award certificate and one step promotion, please.

  
Naib Tehsildar Passports, Torkham  


Attested to be true  
Copy



Fg

(18)

No 468 /NTP-TKM Dated Torkham the

06-02-2018

From The Naib Tehsildar Passport,  
Torkham.

To The Assistant Political Agent,  
Landikotal.

Subject: SEIZURE OF NAUSHADAR (CHEMICALS)  
RECOMMENDATION.

Memorandum.

In continuation of this office memo No. 454/NTP-TKM dated 05-02-2018.


On 05-02-2018, the following team of this office have played a good role in recovery of (632) cartons of Naushadar (chemicals) from a truck bearing No. KBL-1175 at Torkham:-

1. Ali Raza P.M Torkham.
2. Subedar Asghar Shinwari
3. Khass: Shakeel Pakhai Zakha Khel
4. Khass: Zubair Shinwari

In order to encourage them, officials at S.No 01 & 02 are recommended for cash awards and commendation certificates while S.No. 03 & 04 are recommended for awards, certificates and one step promotion so as to encourage them to perform their duties with more zeal and enthusiasm, please.

  
Naib Tehsildar Passports, Torkham

8/02

  
Attested to be true  
Copy

No. 62-64 /NTP-TKM dated Torkham the

05/01/2019.

From: The Naib Tehsildar Passport,  
Torkham.

F 3

(19)

To: The Assistant Commissioner,  
Landikotal.

Subject: - SEIZURE OF ARMS / AMMUNITIONS.

Memo:

Today on 05/01/2019, a source confided that a large number of Arms  
ammunitions will be smuggled into Pakistan through vehicle, as such the undersigned  
alongwith khassadars made "Nakabandi" and started checking of each and every  
loaded vehicle proceeding towards Pakistan. At about 8:30 am, a truck bearing  
registration No.NGR-2974 loaded with mineral coal was stopped at Torkham for  
checking purpose. During search, 113 Nos. of 12 bore Rifle (Repeater) alongwith  
accessories i.e chargers, barrel etc of foreign origin were recovered from the secret  
cavities of the vehicle.

The driver namely Misri Khan s/o Tarakai, Afghan National r/o  
Ningrahar, Afghanistan alongwith truck and 113 Nos. of repeaters (12 bore Rifle)  
were taken into custody.

During preliminary investigation, the driver disclosed that the above  
arms were handed over by Amin, Afghani at Kabul @ Rs.1700/- per rifle and asked  
to hand over the said consignment to Dad Muhammad, Afghani at Ring Road.  
Peshawar.

The driver alongwith seized 113 Nos. rifles (foreign origin) and truck  
are sent under khassadar escort for further necessary action, please.

  
Naib Tehsildar Passport,  
Torkham

Copy forwarded to: -

- 1) The worthy Deputy Commissioner Khyber District for information,  
please.
- 2) The Tehsildar Landikotal for information and necessary action,  
please.

Attested to be true  
Copy  


Received 113 Nos rifles (Foreign origin) along  
with chargers mentioned above.

  
Naib Tehsildar Passport,  
Torkham

Annex "G"

**OFFICE OF THE POLITICAL AGENT, KHYBER**

20



**COMMENDATION CERTIFICATE**

Mr. Shakil Khan, Pakhi Zakha Khel, is a dutiful and energetic Khassadar of Khyber Khassadar Force posted at Torkham. He has played a vital role in recovery and seizure of 500 Kgs of Hashish on 16/12/2015 while being smuggled in a Trailer No. TLD-113 under the mineral coal from Afghanistan into Pakistan. The accused was also arrested.

In recognition of his services, this certificate is awarded to him alongwith cash reward of Rs. Twenty thousand

Dated: 12 /01/2016

*Shahab Ali Shah*  
**SYED SHAHAB ALI SHAH**  
Political Agent, Khyber  
**POLITICAL AGENT**  
**KHYBER**  
*12/01/2016*

**Attested to be true**  
**Copy**

*[Signature]*



G 1

(21)

**OFFICE OF THE POLITICAL AGENT, KHYBER**



**COMMENDATION CERTIFICATE**

Mr. Shakil Khan, Pakhi Zakha Khel, is a dutiful and energetic Khassadar of Khyber Khassadar Force posted at Torkham. He has played a vital role in recovery and seizure of 182 Kgs of Hashish on 24/03/2016 while being smuggled in a Trailer No. 7944 HRT under the mineral coal from Afghanistan into Pakistan. The accused was also arrested.

In recognition of his services, this certificate is awarded to him alongwith cash reward of Rs.10, 000/-

Dated: 02/06/2016.

Cap: (Rtd.) Khalid Mehmood  
Political Agent, Khyber

Political Agent  
Khyber 02/06/2016

Attested to be true  
Copy

G 2 (22)

## COMMENDATION CERTIFICATE

Khassadar Shakeel, Pakhai Zakha Khel, Posted at Torkham is a dutiful and energetic personnel of the Khyber Khassadar Force. He has played a good role in recovery and seizure of a huge quantity of 231 Kilo grams of hashish and 13 Kilo grams of heroin with arrest of the accused on 06/12/2017 while being smuggled from Afghanistan to Pakistan in a trailer truck bearing registration No.KBL-633 via Torkham Border Gate.

This certificate is awarded to him along with cash reward of Rs.10,000/- in recognition of his active role in seizure of the above mentioned large quantity of narcotics.

Dated: 11 / 01 / 2017.



CAPTAIN (RTD.) KHALID MEHMOOD  
**Political Agent, Khyber**  
POLITICAL AGENT  
KHYBER

Attested to be true  
Copy



# Political Agent Khyber

No 703

Date 1/2/2017


## COMMENDATION CERTIFICATE

Mr. Shakil Khan, Pakhi Zakha Khel, is a dutiful and energetic Khassadar of Khyber Khassadar Force posted at Torkham. He has played a vital role in recovery and seizure of 14,298 Kilo grams of gold and arrest of the accused on 26/01/2017 while being smuggled in a Truck No. KBL-76334 from Afghanistan via Torkham towards Pakistan.

In recognition of his services, this certificate is awarded to him alongwith cash reward of Rs. 10, 000/-

Dated: 31/01/2017.



  
CAPTAIN (RTD.) KHALID MEHMOOD  
**Political Agent, Khyber**  
POLITICAL AGENT  
KHYBER

31/01/17

Attested to be true  
Copy



(21) Annex H (94)

50176644 SHAKEEL AHMAD		CNIC: 2120349834895		Desig: CONSTABLE		(80890933) Grade: 07 NTN:		Buckle No.:		Gazetted/Non-Gazetted: N	
PAYMENTS	AMOUNT	DEDUCTIONS	AMOUNT	LOAN/FUND	PRINCIPAL	REPAID	BALANCE				
0001 Basic Pay	19,950.00	3007 GPF Subscription	1,010.00-		GPF#:		47,125.00				
1001 House Rent Allowance	2,384.00	3530 Police wel:Fud BS-1 t	399.00-								
1210 Convey Allowance 20	1,932.00	4004 R. Benefits & Death C	450.00-								
1300 Medical Allowance	1,500.00										
1528 Unattractive Area A	1,000.00										
1547 Ration Allowance	681.00										
1567 Washing Allowance	150.00										
1646 Constabulary R Allow	300.00										
1902 Special Incentive Al	775.00										
2168 Fixed Daily Allowanc	2,730.00										
2314 Risk Allow Police -	7,400.00										
2347 Adhoc Rel Al 15% 22(	1,923.00										

Attested to be true  
 Copy  


PAYMENTS 40,725.00 DEDUCTIONS 1,859.00- NET PAY 38,866.00 01.02.2023 28.02.2023  
 Branch Code:220315 LANDIKOTAL HABIB BANK LIMITED LANDIKOTAL LANDIKOTAL Acct.No: 7900274603

Accounts Office khyber  
 PAYROLL REGISTER

For the month of February ,2023

Page : 472  
 Date : 06.03.2023

DDO : KH4037 District Police Officer Khyber Payroll Section : 001 Payroll 1 Cash Center: 0012

CHA 25

50176644 SHAKEEL AHMAD		CNIC: 2120349834895		Desig: CONSTABLE (80890933)		Grade: 07 NIN:		Buckle No.:		Gazetted/Non-Gazetted: N	
PAYMENTS	AMOUNT	DEDUCTIONS	AMOUNT	LOAN/FUND	PRINCIPAL	REPAID	BALANCE				
0001 Basic Pay	19,950.00	3007 GPF Subscription	1,010.00-		GPF#:		48,135.00				
1001 House Rent Allowance	2,384.00	3530 Police wel:Fud BS-1 t	399.00-								
1210 Convey Allowance 20	1,932.00	4004 R. Benefits & Death C	450.00-								
1300 Medical Allowance	1,500.00										

Accounts Office khyber  
 PAYROLL REGISTER  
 For the month of March ,2023

Page : 483  
 Date : 04.04.2023

DDO : KH4037 District Police Officer Khyber Payroll Section : 001 Payroll 1 Cash.Center: 0012

1528 Unattractive Area A	1,000.00						
1547 Ration Allowance	681.00						
1567 Washing Allowance	150.00						
1646 Constabulary R Allow	300.00						
1902 Special Incentive Al	775.00						
2168 Fixed Daily Allowanc	2,730.00						
2314 Risk Allow Police -	7,400.00						
2347 Adhoc Rel Al 15% 22(	1,923.00						

PAYMENTS	40,725.00	DEDUCTIONS	1,859.00-	NET PAY	38,866.00	01.03.2023	31.03.2023
Branch Code: 220315	LANDIKOTAL	HABIB BANK LIMITED	LANDIKOTAL	LANDIKOTAL	Acct.No: 7900274603		

Attested to be true  
 Copy

①  
H 2  
②

50176644 SHAKHEEL AHMAD		CNIC: 2120349834895		Desig: CONSTABLE (80890933)		Grade: 07 NTN:		Buckle No.:		Gazetted/Non-Gazetted: N	
PAYMENTS	AMOUNT	DEDUCTIONS	AMOUNT	LOAN/FUND	PRINCIPAL	REPAID	BALANCE				
0001 Basic Pay	19,950.00	3007 GPF Subscription	1,010.00-		GPF#:		49,145.00				
1001 House Rent Allowance	2,384.00	3530 Police wel:Fud BS-1 t	399.00-								
1210 Convey Allowance 20	1,932.00	4004 R. Benefits & Death C	450.00-								
1300 Medical Allowance	1,500.00										
1528 Unattractive Area A	1,000.00										
1547 Ration Allowance	681.00										
1567 Washing Allowance	150.00										
1646 Constabulary R Allow	300.00										
1902 Special Incentive Al	775.00										
2168 Fixed Daily Allowanc	2,730.00										
2314 Risk Allow Police -	7,400.00										
2347 Adhoc Rel Al 15% 22(	1,923.00										
<b>PAYMENTS</b>	<b>40,725.00</b>	<b>DEDUCTIONS</b>	<b>1,859.00-</b>		<b>NET PAY</b>	<b>38,866.00</b>	<b>01.04.2023</b>	<b>30.04.2023</b>			
Branch Code:220315	LANDIKOTAL	HABIB BANK LIMITED	LANDIKOTAL		LANDIKOTAL	Acct.No: 7900274603					

Created by true  
 Khyber

Accounts Office khyber  
 PAYROLL REGISTER  
 For the month of April ,2023

Page : 552  
 Date : 02.05.2023

DDO : KH4037 District Police Officer Khyber Payroll Section : 001 Payroll 1 Cash Center: 0012



OFFICE OF THE  
DISTRICT POLICE OFFICER  
KHYBER



Annex I

87

No. 3402 /PA-DPO Khyber

Dated: 25/05/2023

DISMISSAL ORDER

FC Shakeel No. 2617 of District Police Khyber was suspended and closed to Police Lines Khyber vide Order No. 2508/PA-DPO Khyber dated 20/04/2023 due to his involvement in illegal extortions and deployment of civilians, personating as Police officials, in Torkham area.

Thus, an inquiry was initiated against him. Separate charge sheet and statement of allegations were issued. He was called and heard by the inquiry officer. He denied the allegations, however, the civilians namely Sohail Shinwari, Izat and Yousaf submitted in video statements that they were deployed by FC Shakeel in that area. An FIR is already launched against these civilians under Case FIR No. 87, dated 19/04/2023 w/s 170-171/3-1 PPC of PS Landi Kotal. By doing so, he also violated the official orders of this office No. 18/Reader, dated 20/01/2023 and No. 212/Reader dated 18/07/2022 regarding the deployment of private personnel for official policing duties. The available statements of these civilians are strong evidence of his involvement in corrupt practices and thus he was found guilty of it.

Therefore, in pursuance of the recommendation of Inquiry Officer, the undersigned, being the competent authority is satisfied about his involvement in corrupt practices and in order to maintain discipline in the force, hereby awards the delinquent official with Major Punishment of Dismissal from Service as per Section 4-b(iv) of Police (E&D) Rules 1975 (With Amendments - 2014).

*(Signature)*

Capt. @ SALEEM ABBAS KULACHI (PSP)  
DISTRICT POLICE OFFICER,  
KHYBER

OD No. 367 Dated 25/05/2023

No. 3402-06/PA-DPO Khyber

Copies to:

1. DSP HQ, Khyber
2. OHC, DPO Khyber for Record
3. Accountant, DPO Khyber for Stoppage of Pay
4. Service Record Branch/HRMIS for Service Record, Good/Bad Entries

CS CamScanner

CS CamScanner

Attested to be true  
*(Signature)*

Scanned with CamScanner







OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

ORDER.

This order will dispose of the departmental appeal preferred by Ex-Constable Shakeel No. 2617, who was awarded the major punishment of "dismissal from service" under KP PR-1975 (amended 2014) by DPO Khyber vide order No. 3402/PA, dated 25.05.2023.

2- Brief facts leading to the instant appeal are that the defaulter Constable was proceeded against departmentally on the charges that he while posted at Torkham Post, PS Landi Kotal deputed civilian who were personating as police officials wearing police uniforms in Torkham area. The accused civilians were arrested and charged in case FIR No. 87, dated 19.04.2023, w/s 170/171/34-PPC, PS Landi Kotal.

3- He was issued Charge Sheet and Summary of Allegations by DPO Khyber. SP/Investigation, Khyber was appointed as Enquiry Officer to scrutinize the conduct of the accused official. The Enquiry Officer after conducting proper departmental enquiry submitted his findings in which he was recommended for suitable punishment. The competent authority in light of the findings of the Enquiry Officer awarded him the major punishment of dismissal from service.

4- He was heard in person in Orderly Room. During personal hearing, he was given an opportunity to prove his innocence. However, he failed to submit any plausible explanation in his defense. Therefore, his appeal for setting aside the punishment awarded to him by DPO/Khyber vide order No. 3402/PA, dated 25.05.2023 is hereby rejected/ filed.

"Order is announced"

CAPITAL CITY POLICE OFFICER,  
PESHAWAR

No. 21/25-29 /PA, dated Peshawar the 04/10/2023

Copies for information and necessary action to the:-

1. District Police Officer Khyber, along with complete inquiry file.
2. DSP/IOs Khyber.
3. Accountant & OASI Khyber.
4. Official concerned.

Attested to be true  
Attested to be true  
Copy

CS CamScanner

Scanned with CamScanner



OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

Phone No. 091-9210989 Fax: No. 091-9212597

No. 2/62 /PA. dated, Peshawar the 09 10/6 /2023

To: The District Police Officer,  
Khyber

Subject: APPEAL

Memo:

Ex-Constable Shakeel No. 2617 of District Khyber has preferred an appeal for reinstatement in service.

Therefore, it is requested that complete inquiry file of the above named official alongwith complete bio data, good/bad entries, details of his previous minor/major punishments if any, may also be sent to this office to proceed further, please.

*[Signature]* 8/6  
SSP/Coordination  
for CAPITAL CITY POLICE OFFICER,  
PESHAWAR

Attested to be true  
*[Signature]*  
Copy



OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Award "K" (11)

30

**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-FC Shakeel No. 2617. The applicant was dismissed from service by DPO Khyber vide Order Endst: No. 3402/PA, dated 25.05.2023 on the allegations that he while posted at Torkham Post, PS Landi Kotal deputed civilian who were personating as police officials wearing police uniforms in Torkham area. The accused civilians were arrested and charged in case FIR No. 87, dated 19.04.2023, u/s 170/171/34-PPC, PS Landi Kotal.

The Appellate Authority i.e. CCPO Peshawar rejected his instant appeal vide order Endst: No. 2425-29/PA, dated 04.07.2023.

Meeting of Appellate Board was held on 25.07.2024 wherein petitioner was heard in person. The petitioner contended that I had no dealing of any kind with the accused.

The petitioner was heard in person. He was given reasonable opportunity to defend himself against the charges; however he failed to advance any justification. The Board sees no ground and reasons for acceptance of his petition, therefore, his petition is hereby **rejected**.

Sd/-

**AWAL KHAN, PSP**

Additional Inspector General of Police,  
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. S/ 1930-34/24, dated Peshawar, the 06-08-2024.

Copy of the above is forwarded to the:

1. Capital City Police Officer, Peshawar.
2. District Police Officer, Khyber.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.

(SONIA SHAMROZ KHAN)  
PSP

AIG/Establishment,  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

Attested to be true  
Copy

0300-4646237 راجہ 25.07.2023 مورخہ

2617 نمبر قلمی دستخط

راجہ

مادر پر اس کے حقوق کو تسلیم کیا گیا ہے۔

اس کے علاوہ اس کے ذہنی پریشانی، طبی اور روحانی حالت کو مد نظر رکھ کر اس کے لیے مناسب علاج فراہم کیا جائے گا۔

13- اگر کوئی اور شخص اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کرے گا تو اس کے لیے مناسب معاوضہ فراہم کیا جائے گا۔

12- اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

11- اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

10- اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

9- اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

8- اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

7- اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

6- اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

5- اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

4- اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

3- اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

2- اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

1- اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

اس کے ساتھ ساتھ اس کے حقوق کو تسلیم کیا گیا ہے۔

بجائے جہاں اس کے حقوق کو تسلیم کیا گیا ہے۔



**OFFICE OF THE  
DISTRICT POLICE OFFICER  
KHYBER**



Amred L

32

No. 2508 /PA-DPO, Khyber

Date: 29/11/2023

**ORDER**

With reference to Case FIR No. 87, dated 19/11/2023, vs 170, 171, 34 PPC of Police Station Landi Kotal, FC Shakeri No. 2617 of District Police Khyber while posted at Torkham Post, PS Landi Kotal deputed civilians who were personating as police officials, pictures attached, using police uniforms in Torkham area. It is also a violation of the official orders No. 19/Reader, dated 20/01/2023, and No. 212/Reader, dated 18/07/2022 regarding the deputation of private individuals for official policing duties.

Thus, he is hereby suspended, with stoppage of pay, and closed to Police Lines Khyber with immediate effect. He is directed to report to Police Lines Khyber forthwith.

Separate Chargesheet and Statement of allegations shall follow.

Capt. & SALEEM ABBAS KULACHI (PSP)  
DISTRICT POLICE OFFICER  
KHYBER

29/11/23

OB No. 265 /dated 29/11/2023

No. 2509-13 /PA-DPO, Khyber

Copies to:

1. DSP HQ/PL Lines to ensure his presence
2. OIC DPO Office Khyber for Transfer/Posting Record
3. Accountant Khyber for stoppage of pay
4. Service Record Branch for compilation of Service Record
5. HR/IS Branch, Khyber to update profiles

Attention is to be drawn  
Copy

بعدالت جناب سر سٹریٹس بیونک پشاور

شکلیہ انگرہ نام لویس

مخانب ایپل انٹ ڈعوی اجرم S.A

تھانہ رز ایف آئی آر تاریخ

باعث تحریر آنک

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوا بدہی بہ مقام لیسٹا کے لئے

امین الرحمن یوسف زئی و خالد خان مہمند

ایڈوکیٹس ہائی کورٹ

کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہونا ہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا اگر پیشی پر سن مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا پیچھے یا بزور تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام کچہری کے کسی اور جگہ سماعت ہونے یا بزور تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر سن مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ برداشتہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعوی و جواب دعوی اور درخواست اجرائے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرانے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد تالی و راضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعوی دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم انتظامی یا قرتی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادائیگی علیحدہ مختار نامہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزو کی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا بیرٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختار نامہ لکھ دیا کہ سندر ہے موبائل نمبر 0321/8/24 مضمون مختار نامہ من لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

ATTESTED &amp; ACCEPTED:

امین الرحمن یوسف زئی  
ایڈوکیٹ ہائی کورٹ ایڈوکیٹ رل شریعت کورٹ آف پاکستان

ایڈوکیٹ آئی ڈی نمبر: BC-10-7562

موبائل نمبر: 0321-9022964

شخصی کار نمبر: 17301-5813582-3

خالد خان مہمند

ایڈوکیٹ ہائی کورٹ، پشاور

ایڈوکیٹ آئی ڈی نمبر: BC-18-1115

آفس: 3-A، پھٹی پلازہ، پارک ایونیو، یونیورسٹی ٹاؤن چوک،

امین الرحمن

ایڈوکیٹ

BC-22-5744

صہاد اسرف خلیف  
ایڈوکیٹ