

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Appeal No. 1032/2018

Date of Institution ... 17.08.2018

Date of Decision ... 19.03.2019

Wali Bat Khan son of Gul Bat Khan R/O Choorlakki, Tehsil and District Kohat. ... (Appellant)

VERSUS

Provincial Police Officer/Inspector General of Police Khyber Pakhtunkhwa Peshawar and three others. ... (Respondents)

Present.

Mr. Shahid Qayum Khattak,
Advocate. ... For appellant

Mr. Ziaullah,
Deputy District Attorney ... For respondents.

MR. HAMID FAROOQ DURRANI, ... CHAIRMAN
MR. AHMAD HASSAN, ... MEMBER

JUDGMENT

HAMID FAROOQ DURRANI, CHAIRMAN:-

1. The facts relevant for the purpose of appeal in hand, are that on 13.05.2018 an FIR was lodged upon the report of appellant who was performing duty as ASI at P.S Lachi District Kohat at the relevant time.

The offence recorded through FIR was regarding recovery of 120 grams.

chars gardah from a woman Mst. Parveen Bibi widow of Inayat Shah R/O Fateh Khan Banda Tehsil Lachi, District Kohat. It was disclosed by the accused that she obtained the recovered chars from her son to hand it over to accused Nazir son of Laiq Khan r/o Mir Ali employed in fuel station near Toll Plaza. Pertinently, the occurrence took place at a spot near the said Toll Plaza. As per the contents of FIR a sample of five grams was separated for analysis at FSL and was sealed at the spot. Necessary arrest of Mst. Parveen Bibi and Nazir was effected and the case was registered under 3/4 P.O.

On the very next day i.e. 14.05.2018 a charge sheet and statement of allegations were issued to the appellant, wherein, it was alleged that he while posted at P.S Lachi lodged a fabricated report vide FIR No. 240 dated 13.05.2018 u/s 3/4 P.O. P.S Lachi for his personal gain. It was alleged that the appellant was found ill-reputed and indulged himself in extra-departmental activities. Mr. Jamil Akhtar, S.P Operation Kohat was appointed as enquiry officer to probe into the matter. The requisite enquiry report was submitted on 11.06.2018 and it was followed by an order dated 27.06.2018 through which the District Police Officer, Kohat imposed major punishment of reduction from higher stage to lower stage in the same time scale of pay for the period of three years, upon the appellant. The appellant submitted a departmental appeal/representation on 06.07.2018 which could not find favour and was rejected on 06.08.2018, hence the appeal in hand.

2. We have heard learned counsel for the appellant, learned DDA on behalf of the respondents and have also gone through the available record.

Learned counsel for the appellant contended that the appellant was not issued any show cause notice before passing of the impugned penalty against him. It was also argued that there was no evidence on record to link the appellant with the allegations; therefore, the very penalty awarded to him was not called for in the circumstances of the case. It was also stated that the accused woman was not associated with the enquiry proceedings who could have been a star witness in the matter.

On the other hand, learned DDA contended that the enquiry report dated 11.06.2018 was exhaustive on the point and the enquiry officer had rightly dealt with the case of the appellant. He stated that all codal requirements were fulfilled before passing of the impugned order. In his view, the impugned order was not exceptionable.

3. We have carefully examined the enquiry report dated 11.06.2018, wherein, it was concluded that the involvement of Nazir son of Laiq Zaman in criminal case u/s 3/4 PEHO seemed dubious and illegal in nature. ASI/SHO, instead of tracing the source of purchase of contrabands/chars, charged and arrested on ill-will Nazir son of Laiq Zaman for his own person gain. It was further concluded that involvement of SHO Tahir Nawaz in the matter could not be ruled out. It was, therefore, suggested that he may be dealt with in separate departmental

proceedings. The representative of the respondents appearing before the Tribunal today, when asked about the initiation of proceedings against SHO Tahir Nawaz, replied that no such proceedings were ever initiated.

In the enquiry report a reference was made to the charge sheet dated 14.05.2018. In furtherance of the allegations the enquiry officer recorded the statement of appellant besides the statements of Tahir Nawaz SHO, Constable Lal Zada No. 512, DFC Jamshaid No. 655, Constable Kashif Saeed No. 988, Constable Muhammad Nazar No. 1376 and constable Muhammad Qasim No. 702 were also obtained. The said statements were duly made part of the reply/record which transpire that in the statement of Tahir Nawa SHO P.S Lachi it was noted that on the relevant day he was informed by the appellant in terms that at the Naka Bandi a woman was apprehended with contrabands. Upon the receipt of the said call the SHO immediately reached the spot. During the interrogation the accused woman named one Nazir for whom the chars was being transported. The SHO then asked the appellant to proceed against both the accused in accordance with law. Similarly, in their respective statements the other officials of the department concurred with the contents of FIR and also stated that the accused woman disclosed the fact of involvement of one Nazir to the SHO upon his arrival. The said statements, although made basis for finding in the departmental enquiry against the appellant, did not divulge of any ill will on the part of the appellant in seizing the contraband chars or arrest of the accused.

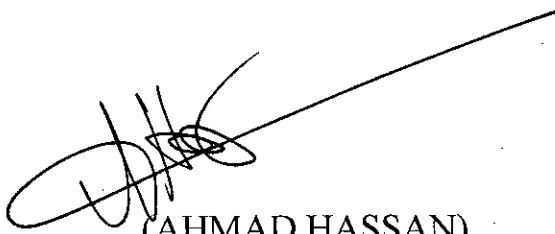
4. We have noted with great concern that the record is silent about any incidence of personal gain by the appellant nor there is any complaint in the said regard by either of the two accused. It is also an admitted fact that the statement of Mst. Parveen Bibi widow of Inayat Shah or Nazir son of Laiq Khan was not recorded during the enquiry proceedings. The said accused could have been the most important witnesses regarding the allegations against the appellant.

5. There is yet another aspect of the case in hand. The departmental proceedings seem to have been initiated in unnecessary haste when the statement of allegations and charge sheet were issued to the appellant on the very next day of occurrence on 13.05.2018. It is a fact that the appellant was legally obligated to have proceeded against the culprits upon commission of an offence and the first step required to be taken after recovery of contrabands and arrest of accused was to have the FIR recorded. The record suggests that the appellant proceeded further in the matter and duly sent the sample of contraband chars separated from the whole which was tested positive by the Forensic Science Laboratory, Police Investigation Khyber Pakhtunkhwa, Peshawar. We have also noted that regarding the other allegation qua ill reputation of appellant the matter was not dealt with by the enquiry officer. Needless to reiterate that the aspect of personal gain of the appellant in the whole episode could not be proved in the case in hand. In view of the available record and the contents of impugned order dated 27.06.2018, we are constrained to hold also that

no show cause notice was issued to the appellant before imposition of major penalty.

6. As a sequel to the above discussion, the appeal in hand is allowed as prayed for in its memorandum.

Parties are left to bear their respective costs. File be consigned to the record room.



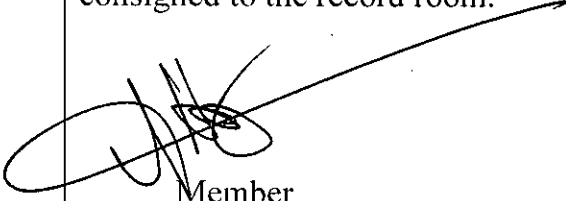

(AHMAD HASSAN)
MEMBER



(HAMID FAROOQ DURRANI)
CHAIRMAN

ANNOUNCED
19.03.2019

1032/2018

S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	19.3.2019	<p><u>Present.</u></p> <p>Mr. Shahid Qayum Khattak, Advocate ... For appellant</p> <p>Mr. Ziaullah, Deputy District Attorney, ... For respondents</p> <p>Vide our detailed judgment of today, the appeal in hand is allowed as prayed for in its memorandum.</p> <p>Parties are left to bear their respective costs. File be consigned to the record room.</p> <p> Member</p> <p> Chairman</p> <p><u>ANNOUNCED</u> 19.03.2019</p>

Service Appeal No. 1032/2018


11.12.2018


Counsel for the appellant present. Mr. Ishaq Gul, DSP (Legal) alongwith Mr. Kabirullah Khattak, Additional AG for the respondents present. Written reply submitted. The appeal is assigned to D.B-II for rejoinder and arguments for 31.01.2019.


Muhammad Amin Khan Kundi
Member

31.01.2019

Learned counsel for the appellant present and submitted rejoinder which is placed on file and seeks adjournment. Adjourn. To come up for arguments on 19.03.2019 before D.B


Member


Member

24.08.2018

Counsel for the appellant Wali Bat Khan present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving in Police Department as ASI. It was further contended that the appellant was imposed major penalty of reduction from higher stage to lower stage in the same time scale of pay for the period of three years vide order dated 24.06.2018 on the allegation that he while posted as PS Lachi lodged a fabricated report incorporated vide FIR No. 240 dated 13.05.2018 under Section 3/4 PO, PS Lachi for his personal gain. That the appellant filed departmental appeal 06.07.2018 which was rejected on 06.08.2018 hence, the present service appeal. It was further contended that neither proper inquiry was conducted nor opportunity of cross examination and personal hearing was provided nor any final show-cause notice was issued to the appellant therefore, the impugned order is illegal and liable to be set-aside.

Appellant Deposited
Security Process Fee

The contention raised by the learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to deposit of security and process fee within 10 days thereafter, notice be issued to the respondents for written reply/comments for 25.10.2018 before S.B.

M A
(Muhammad Amin Khan Kundi)
Member

25-10-18



*Due to retirement of Honorable
Chairman the Tribunal is non
functional therefore the case is
adjourned to come up for the
same on 11-12-2018*

Readme

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1032/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/08/2018 18-8-18	The appeal of Mr. Wali Bat Khan presented today by Mr. Shahid Qayyum Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.  REGISTRAR 17/8/18
2-		This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>24-8-2018</u> .  CHAIRMAN

BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 1032 /2018

Wali Bat Khan Appellant

Versus


Provincial Police Officer and others.....Respondents

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Appellant

Through


Shahid Qayum Khattak
Advocate, High Court
Peshawar
Mob No. 0333-9195776

Dated: /08/2018

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BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 1032 /2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1301

Wali Bat Khan S/o Gul Bat Khan R/o Choorlakki

Dated 17-8-2018

Tehsil & District Kohat..... Appellant

Versus

1. Provincial Police Officer/ Inspector General of Police
Khyber Pakhtunkhwa, Peshawar
2. Deputy Inspector General of Police Kohat Region, Kohat.
3. District Police Officer, Kohat
4. Government of Khyber Pakhtunkhwa through
Chief Secretary, Peshawar

..... Respondents

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974
AGAINST THE ORDER DATED 24/06/2018 PASSED BY
RESPONDENT NO. 3 BY WHICH MAJOR PENALTY OF
REDUCTION FROM HIGHER STAGE TO LOWER STAGE IN THE
SAME TIME SCALE OF PAY FOR THE PERIOD OF 03 YEARS HAS
BEEN AWARDED TO THE APPELLANT AND AGAINST THE ORDER
DATED 01/08/2018 OF RESPONDENT NO. 2 BY WHICH THE
DEPARTMENTAL APPEAL FILED BY APPELLANT HAS BEEN
REJECTED.

PRAYER

On accepting this service appeal, the impugned order bearing OB No. 722 dated 25/06/2018 and order dated 01/08/2018 bearing No. 4863/EC, dated Kohat the 06/08/2018 may graciously be set aside by declaring it illegal, void, unlawful, without authority, based on mala fide, void abinitio and thus not sustainable and the appellant is entitled for all back benefits of pay and service

Respectfully Sheweth;

1. That appellant joined police department in the year, 1989 and has rendered satisfactory service in the Department and has earned promotion to the rank of ASI and performed his duties with full zeal and enthusiasm.

Filed to-day
Registrar
17/8/18

2. That respondent No. 3 issued a charged sheet to the appellant on 14/05/2018 containing the allegation of lodging fabricated report incorporated vide FIR No. 240 dated 13/05/2018 for personal gain which has properly been replied by the appellant on 28/05/2018. (Copies of charge sheet and reply are attached)
3. That after the reply of appellant an enquiry was conducted but nothing material was brought on record against appellant rather the statement recorded fully support the version of appellant that he is innocent but still without issuance of show cause notice passed impugned order dated 24/06/2018 vide which major punishment of reduction from higher stage to lower stage in the same time scale of pay for the period of 04 years has been imposed. (Copy of the enquiry report and impugned order are attached)
4. That appellant filed departmental appeal against the impugned order before worthy respondent No. 2 who vide order dated 01/08/2018 issued on 06/08/2018 rejected the same without complying the codal formalities hence, the petitioner feeling aggrieved from the above orders filling this appeal on the following amongst other grounds inter. (Copy of the representation and impugned order are attached)

GROUNDS:

- a. That both the impugned orders of the respondents are illegal, unlawful, without authority, based on mala fide intention, void abinitio, against the nature justice, in violation of the Constitution mandate and Service Law and equally with out jurisdiction, thus untenable in the eyes of law and is liable to be set aside.
- b. That both the impugned orders passed by respondent are very much harsh, without any evidence based on surmises & conjectures and is equally against the principle of natural justice.
- c. That the respondent No. 3 has not issue any show cause notice nor any proper opportunity of hearing has been provided to

appellant but this aspect has not been taken into consideration by learned respondent No. 2 at all thus the impugned orders are nullity in the eyes of law and is liable to be set aside.

- d. That it is very much evident from the enquiry report that the allegation leveled in the charge sheet has not been proved through cogent evidence and the statement recorded by the enquiry officer in absence of appellant has no evidentiary value in the eyes of law further the statement recorded by the enquiry officer cannot be used against appellant as they not deposed against appellant rather they support the stance of appellant but still the same are not taken into consideration.
- e. That the case of appellant has been treated in very arbitrary manners and no evidence what so ever has been brought on record to substantiate the allegation leveled against appellant rather he has been proceeded under the rules and regulation which are not at all applicable to petitioner being a civil servant.
- f. That the whole departmental file against appellant has been prepared in violation of law and rules as the enquiry officer has based his finding on assessment and speculations. The findings have not been based on sound reasons and any solid, material and cogent evidence.
- g. That no opportunity of cross examination of the witnesses has been provided to appellant and enquiry officer in order to extract favourable answer in support of charges from the mouth of the witnesses himself put cross questions to the witnesses which fully proved the biased attitude of enquiry officer but still he fails to prove the allegation leveled against appellant as no witness utter a single word against appellant.
- h. That the enquiry proceedings against appellant suffered from gross infirmities, illegalities and irregularities as no evidence what so ever has been produced or cited in the enquiry report nor any witness has been examined before the appellant.
- i. That it is very much clear from the enquiry report and summons issued by the enquiry officer to the complainant and his evidence but they badly fails to appear and substantiated

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the charges leveled against the appellant but still the appellant has been held responsible for unfolded evidence.

- j. That the impugned order has been based on hallowed and unfounded assessments of enquiry officer who was otherwise not competent to conduct enquiry, therefore the orders based on such enquiry are worth set aside.
- k. That no show cause notice under the relevant provision of law has been issued to appellant which is mandatory under the law. Similarly appellant was not personally heard and no opportunity of defense has been provided to appellant nor proper proceeding under proper law has been carried against the appellant.
- l. That the respondent No. 2 by himself committed misconduct due to the reason that a criminal case was lodged against complainants and the trial of the same has not yet concluded but respondents prior to the decision of the competent court of law give a clear chit to complainant. It is further submitted that all the material against accused are available in the case file but still the same aspect of the case has been considered at all.
- m. That appellant in his departmental appeal raised number of material grounds and his progress reports (the same may please be taken as integral part of this appeal too) but the same has not been taken into consideration at all.
- n. That the entire service record of the appellant is unblemished therefore, the impugned order would be a black stigma on the clean service career of the appellant, therefore, the same is liable to be set aside. Furthermore performing official duties as per directions of the senior official, appellant can not be held responsible for any alleged offence. The record of case FIR No. 240 dated 13/05/2018 clearly suggest the involvement of complainants in criminal activities but that has not been taken at all by the respondents. It is further submitted that accused of case FIR No. 240 was the co-villager of one of the High Police Officer due to which the appellant has been made a scapegoat just to give him benefit in criminal case. Whether passing of such type of order will not give him acquittal in case FIR No.

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240, whether for such acquittal respondent will not be responsible and whether they are not required to be proceeded under the disciplinary proceedings under relevant provisions of law. Appellant also reserved rights to adopt legal course against respondents for their such unprofessional attitude.

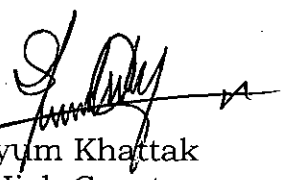
- o. That impugned order dated 24/06/2018 and 01/08/2018 are suffered from gross infirmities, illegality, based on no evidence totally contradictory to the enquiry report further appellant being a civil servant has not been proceeded under relevant provision of rules and regulation.
- p. That the learned respondent has not taken into consideration that the rules under which the appellant has been charged are not applicable on him.

It is, therefore, most humbly prayed that by accepting this service appeal, the impugned order bearing OB No. 722 dated 25/06/2018 and order dated 01/08/2018 bearing No. 4863/EC, dated Kohat the 06/08/2018 may graciously be set aside by declaring it illegal, void, unlawful, without authority, based on mala fide, void abinitio and thus not sustainable and the appellant is entitled for all back benefits of pay and service.

Any other relief not specifically prayed for but deem appropriate in the circumstances of the case may also be granted.

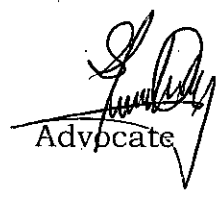

Appellant

Through


Shahid Qayyum Khattak
Advocate, High Court
Peshawar

Dated: /08/2018

Certified that as per instruction of my client no such appeal has been filed before this Hon'ble Forum.


Advocate

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BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. /2018

Wali Bat Khan Appellant

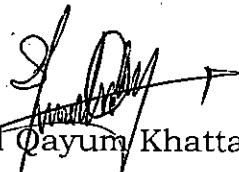
Versus

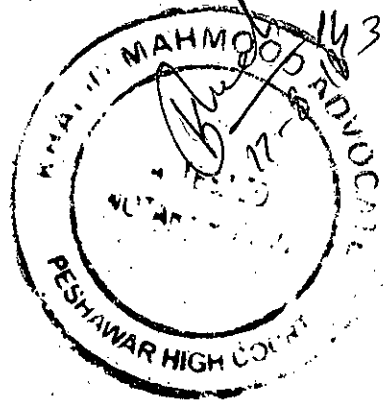
Provincial Police Officer and others..... Respondents

Affidavit

I, Wali Bat Khan S/o Gul Bat Khan R/o Choorlakki Tehsil & District Kohat, do hereby solemnly affirm and declare on Oath that the contents of the above appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Hon'ble Tribunal.

Identified by


Shahid Qayum Khattak
Advocate



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BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. /2018

Wali Bat Khan Appellant

Versus

Provincial Police Officer and others..... Respondents

ADDRESS OF THE PARTIES

APPELLANT

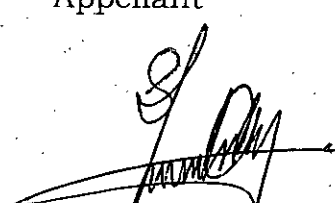
Wali Bat Khan S/o Gul Bat Khan R/o Choorlakki Tehsil
& District Kohat

RESPONDENTS

1. Provincial Police Officer/ Inspector General of Police
Khyber Pakhtunkhwa, Peshawar
2. Deputy Inspector General of Police Kohat Region, Kohat.
3. District Police Officer, Kohat
4. Government of Khyber Pakhtunkhwa through
Chief Secretary, Peshawar

Appellant

Through


Shahid Qayum Khattak
Advocate, High Court
Peshawar

Dated: /08/2018



No 4898-99/PA

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Office of the
District Police Officer,
Kohat

Dated 14-5-2018

CHARGE SHEET.

I, ABBAS MAJEED KHAN MARWAT, DISTRICT POLICE OFFICER, KOHAT, as competent authority under Khyber Pakhtunkhwa Police Rules 1975 (amendment 2014) am of the opinion that you ASI Walibat Khan rendered yourself liable to be proceeded against, as you have committed the following act/omissions.

- i. That you while posted at PS Lachi lodged a fabricated report incorporated vide FIR No. 240 dated 13.05.2018 u/s 3/4 PO, PS Lachi for your personal gain.
- ii. That you are found ill reputed and indulged yourself in extra departmental activities.

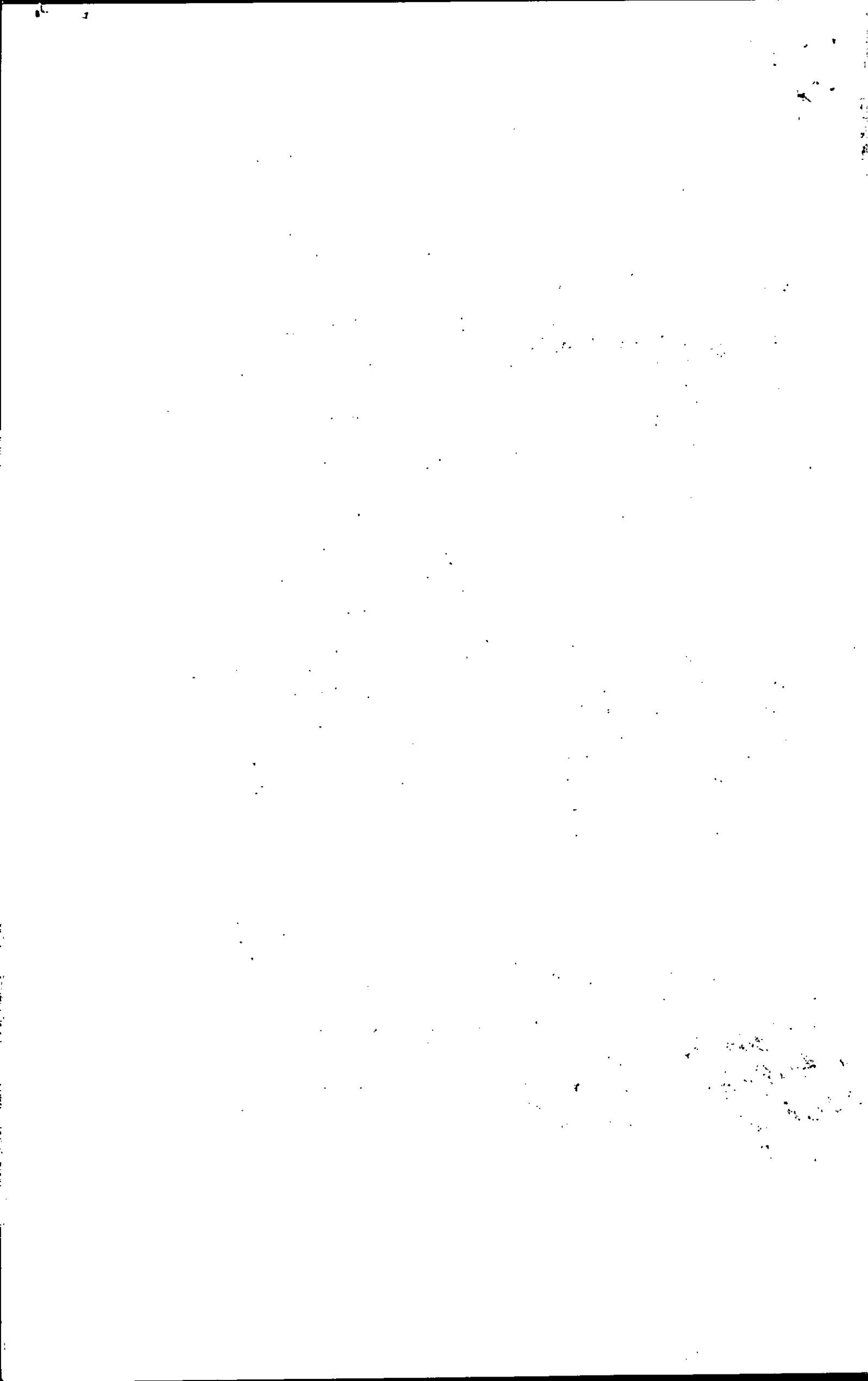
2. By reasons of the above, you appear to be guilty of gross professional misconduct under Rule 3 ibid and have rendered yourself liable to all or any of the penalties specified in the Rule 4 of the Rules.

3. You are, therefore, required to submit your written statement within 07days of the receipt of this Charge Sheet to the enquiry officer.

Your written defense if any should reach the Enquiry Officer within the specified period, failing which it shall be presumed that you have no defense to put in and ex-parte action shall be taken against you.

4. A statement of allegation is enclosed.


DISTRICT POLICE OFFICER,
KOHAT 14/5





No 4898-99/PA

Office of the
District Police Officer,
Kohat

Dated _____/2018

DISCIPLINARY ACTION

I, **ABBAS MAJEED KHAN MARWAT, DISTRICT POLICE OFFICER, KOHAT**, as competent authority, am of the opinion that you **ASI Walibat Khan** have rendered yourself liable to be proceeded against departmentally under Khyber Pakhtunkhwa Police Rule 1975 (Amendment 2014) as you have committed the following acts/omissions.

STATEMENT OF ALLEGATIONS

- i. That you while posted at PS Lachi lodged a fabricated report incorporated vide FIR No. 240 dated 13.05.2018 u/s 3/4 PO, PS Lachi for your personal gain.
- ii. That you are found ill reputed and indulged yourself in extra departmental activities.

2. For the purpose of scrutinizing the conduct of said accused with reference to the above allegations **Mr. Jamil Akhtar SP Operations Kohat** is appointed as enquiry officer. The enquiry officer shall in accordance with provision of the Police Rule-1975, provide reasonable opportunity of hearing to the accused official, record his findings and make, within twenty five days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused official.

The accused official shall join the proceeding on the date, time and place fixed by the enquiry officer.

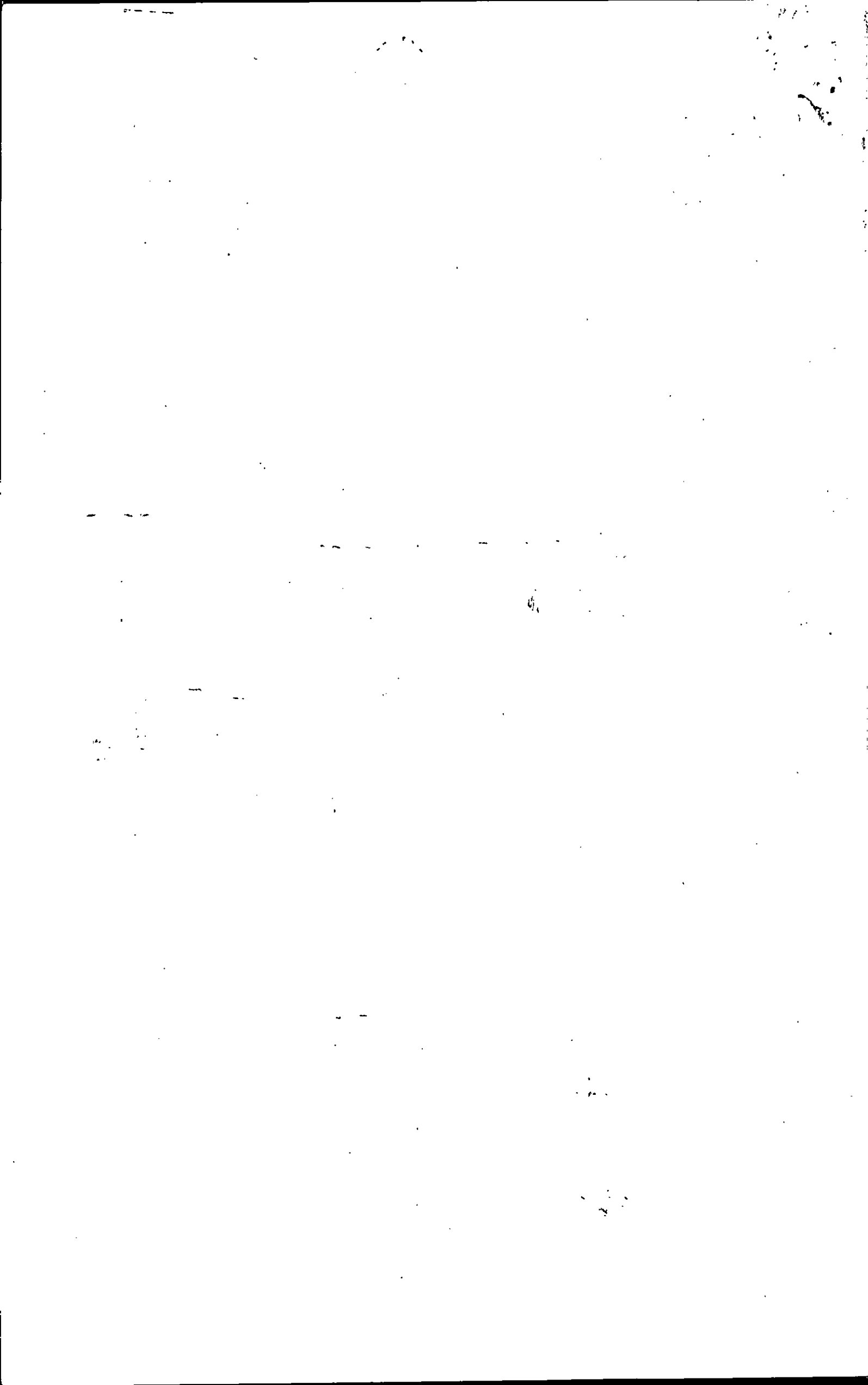
**DISTRICT POLICE OFFICER,
KOHAT**

No. 4898-99/PA, dated 14-5- /2018.

Copy of above to:-

1. **Mr. Jamil Akhtar SP Operations Kohat** :- The Enquiry Officer for initiating proceedings against the accused under the provisions of Police Rule-1975.
2. The **Accused officer**:- with the directions to appear before the Enquiry Officer, on the date, time and place fixed by him, for the purpose of enquiry proceedings.

ATTESTED



بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ (10)

حیات عالیہ

حوالہ مشورہ چارج سہیت حلفاً مفوض ہوں کہ مجھ

پر ننگہ الزام بے بنیاد ہے سیرا کوئی کسی عباد، بدیانتی، افساد یا لالچ نہیں ہے۔ نہ کسی کیا فہم ذاتیات ہیں۔

برہم قابل دست اندازی کے احکام، یا ارتکاب پر زبردختہ 154 ضابطہ فوجداری FIR درج کیا لازم ہے جسکی دوگردانی نا ممکن ہے

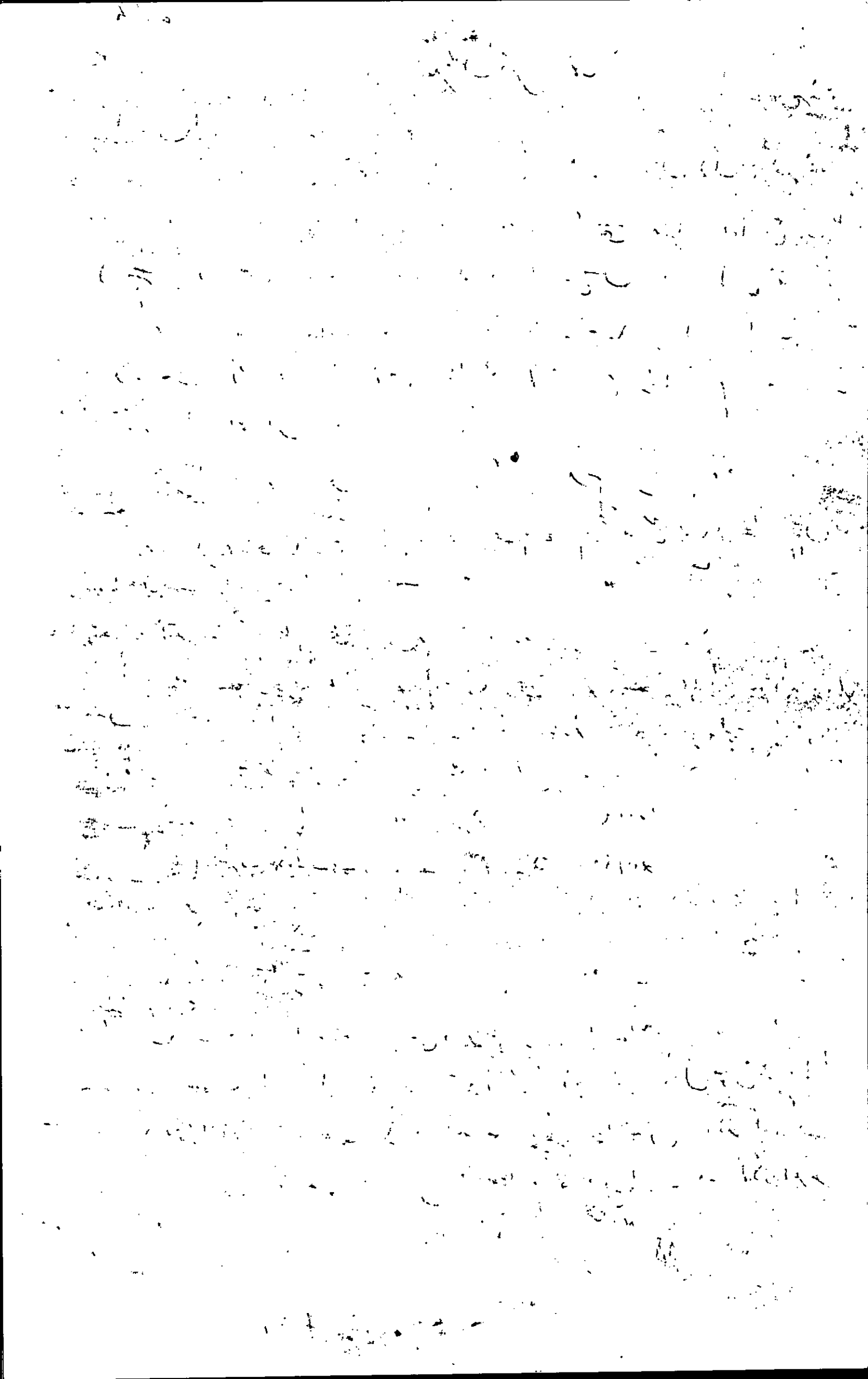
مزید تیرہ ایس صورت میں کچھی برہم میں FIR کا متن کسی واقعے کو اصل اور مکمل نشانہ ہی نہیں ہو سکتا ہے بلکہ اس کو (156) ضابطہ فوجداری کے عمل سے گزارنا پیرا نمبر 1 قابل حقائق سامنے آسکیں۔

تعمیر ایچا درج ہی نہیں ہوا تھا۔ کہ جو پیر کسی نے کوئی الزام لگائے بغیر، مجھے وہی مل اور CPD میں منسری کے احکامات ملے ہیں۔ اسے کسی نمائندہ سے لگ جگہ FIR 15 درج کیے ہیں، جو جوہر کے طور پر ہر ادا جو اپنے الصہ میں جو نمونہ سے کچھ دن زیادہ ہیں، سیرا سروس ریکارڈ، میٹر محکمہ کے ساتھ ملگن، اور احکامات کا واقع حسب چارج سہیت عدم عدت 240 ختم 2018-5-13 برہم 348 کا نہ لائی ہے۔

تحقیق ہے کہ ختم 2018 13 بوقت 10:30 بجیل میں تھا میں موجود تھا۔ اور کسی مقدمہ میں کا مقدمہ کو ٹریسٹ کرنا تھا کہ میں دوران کانٹریل کانسٹبل سہیت 158 نے ہڈر کیہ سو پائل خون عمر بنایا، کہ آپ فوراً تانہ سہیت کے نظام پر پیجج جی ایس، کونکہ ریل عمدر سیدہ خاؤں پر فتح پوسٹ نظام پر سہایت مشورہ اور گھبراہٹ کے عالم میں موجود ہے

ATTESTED

PTO



اسی اطلاع کو 540 میں نوٹس میں لاکر دو اسٹروا جوہی میں
 واضح پر پتہ لگا، تو پایا گیا، کہ عہدہ دیوین لابی پر وہ عہدہ شاہ مسلم
 فتح خان ماٹھہ لاپی عمر 45/4 سال نے ظاہر کیا، کہ میں اپنے گھر سے جس لیکر
 نزدیکی میں نڈیر نام کے گھر کو دیتا تھا، لیکن پوسٹ کی نظر میں پتہ لگا
 تو گھبرا گیا، اور جس میں پتہ لگا ہے وہ زمین پر گرتے ہوئے پوسٹ کا ٹیلے
 اٹھانے کے اس دوران 540 میں گھسے ہوئے جو جمع ہو گیا اور سہ ماہی کے
 وہی رہا بیان 540 کو بھی دھیرا یا 540 میں نے فرمایا کہ واسطے احضار
 بالاحتمال کے نوٹس میں لائے، ان کا حکم ہے، کہ قانونی کارروائی کر کے
 سہ ماہی محرم کو گرفتار کیا، جبکہ نڈیر کی گرفتاری کیلئے یہ عہدہ لگا گیا
 پتہ حاکم گرفتار کیا،

مسلم نے دوران گرفتاری ظاہر کیا کہ مجھے لیجاوا لے گئے تھے لہذا پتہ لگا
 سارے موقع پر موجود اہل گارڈ کو دیکھ کر، کہتا وہی ہوا جس کا درد میں
 بھی تک جھوس کر رہا ہوں۔

میرے FIR واقعات کے مطابق اور رپورٹ کی طرح آیا ہے، اور ذیل واقعاتی
 سہ ماہی کے پتہ میں نظر پر دو ملزمان نے ثابت کیے کہ سہ ماہی کا تعلق ماٹھہ فتح خان
 سے ہے جبکہ ملزم کا تعلق پتہ لگا میرا نشاد سے ہے، جو عہدہ سے قبل لگا ہوا اور
 حوالہ خارج شدہ ہے اور قابل تردید ثابت ہے۔

محرم کا وہی پتہ فون = 0335-5225803

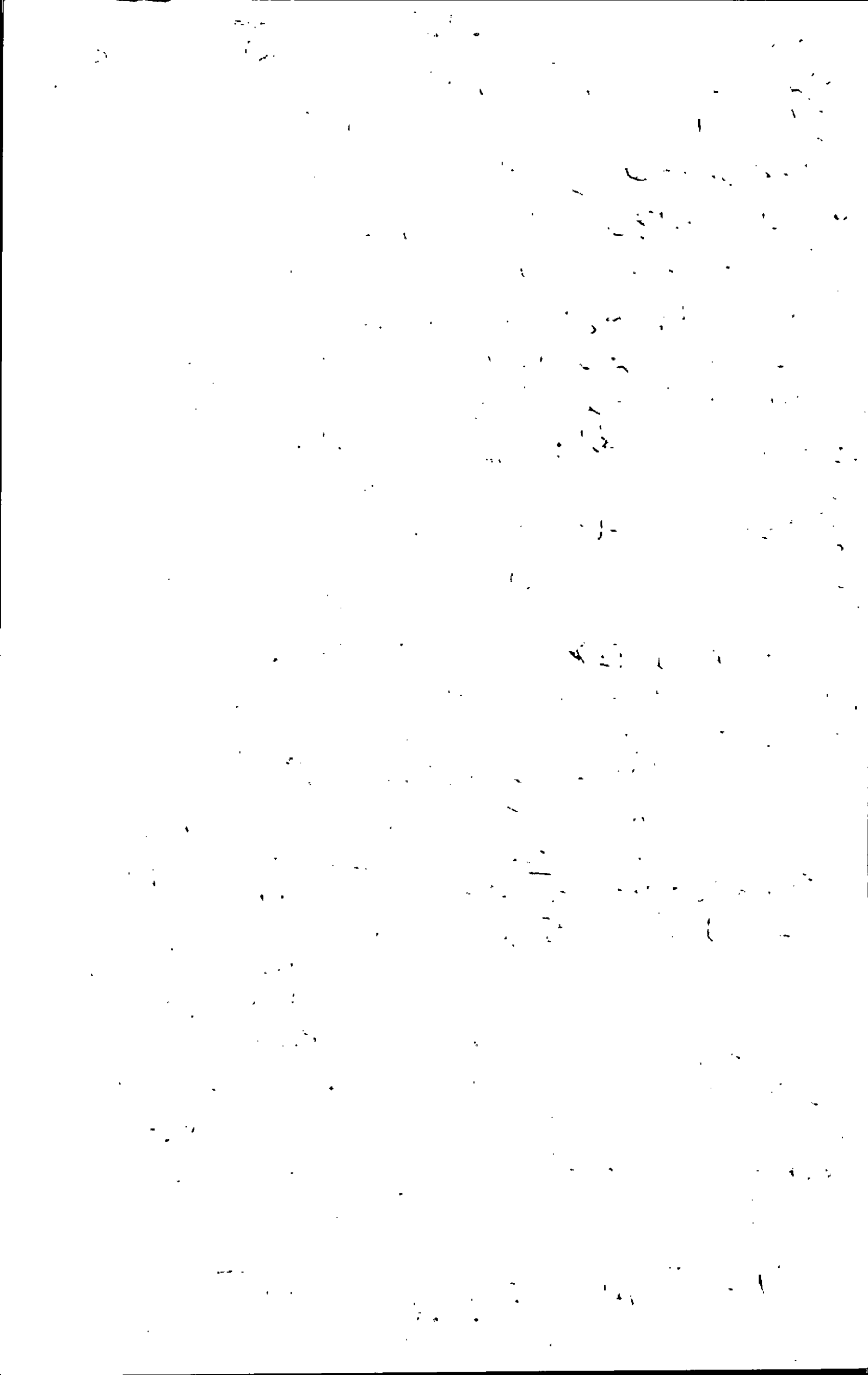
محرم کا وہی پتہ فون = 0335-5633525

و عہدہ 13/8/08 وقت 10:00 بجے پتہ لگا پر دو نوٹس فون پتہ لگا 8/13
 کو پتہ لگا 08:30 بجے سے 08:35 یعنی 5 منٹ یا سچل چکی ہے
 جو ایک واقعاتی سہ ماہی ہے۔

جیاتی علی

7 مئی 28 سال فوکی پتہ لگا اپنی چھوٹی حسرت میں
 بے شمار بڑے بڑے کیس پر خلاف ملزمان درج حشر کیے ہیں
 اور کبھی کبھی بھی فوکی قسم کی کوئی Complainٹ میرا خلاف ہوئی ہے میرا
 صروس ریکارڈ پتہ لگا کے Complainٹ کا کواٹری اور میرا تعلق پر
 میری عہدہ حسرت کو مد نظر رکھتے ہوئے خارج شدہ قابل کر سکی

Asi Wali Bat Khan S
 ATTESTED 28/8/08



(12)

**FINDINGS IN DEPARTMENTAL INQUIRY AGAINST
WALIBAT KHAN ASI OF PS LACHI DISTRICT, KOHAT (UNDER SUSPENSION)**

FINDINGS

Sir,

It is submitted that the undersigned have been appointed as inquiry officer in departmental inquiry initiated against ASI Walibat Khan of police station Lachi, Kohat who is proceeded with departmentally under KP, Police Rules 1975 (Amended-2014).

The brief of the inquiry is that Walibat Khan ASI (*hereinafter referred accused official*) was served with charge sheet alongwith statement of allegations issued by DPO office vide Memo: No. 4898-99/PA dated 14.05.2018 on charge that while he was posted at police station Lachi lodged a fabricated report incorporated vide FIR No. 240 dated 13.05.2018 u/s 3/4 PO police station Lachi for his personal gain and he was also found ill reputed and indulged himself in extra departmental activities. Walibat Khan ASI was closed to CPO, Peshawar on above complaint basis vide Order Endst: No. 981-83/E-III dated 14.05.2015, and he was also suspended vide DPO office Order Endst: No. 4900-01/PA dated 14.05.2018. Charge sheet alongwith statement of allegations was served upon accused official. He submitted reply of charge sheet within stipulated period. (statement attached herewith for ready reference please)

For scrutinizing the conduct of ASI Walibat, he was summoned for personal hearing, recorded his statement. In his written reply of charge sheet and summary of allegations he defended himself pleading his innocence. He stated in his written statement that he was present in PS Lachi with constable Lal Zada No. 512 meanwhile information received that a female namely Mst. Parveen Bibi w/o Inayat Shah r/o Fateh Khan Banda Tehsil Lachi, District Kohat bounded in connection with chars at Toll Palaza Naka Bandi, on this information he went to Toll Palaza Nakabandi. He interviewed accused Mst. Parveen Bibi w/o Inayat Shah r/o Fateh Khan Banda Tehsil Lachi, District Kohat and it was disclosed to him that she obtained the recovered chars from her son to hand over to accused Nazir who is running fuel station near the Lachi Toll Palaza. Walibat Khan ASI arrested Accused Mst. Parveen Bibi w/o Inayat Shah r/o Fateh Khan Banda Tehsil Lachi, District Kohat in the meanwhile, SHO Tahir Nawaz arrested accused Nazir s/o Laiq Khan r/o Mir Ali employed in fuel station near Toll Palaza. (statement attached herewith for ready reference please)

2. Former SHO PS Lachi Tahir Nawaz SI was summoned for appearance to find out facts in inquiry proceedings, recorded his statement. He stated in his statement that he received information by ASI Walibat that one female accused bounded at Nakabandi in connection with carrying chars. He gave direction to the ASI Walibat to adopt legal proceedings against the accused. SHO Tahir Nawaz also produced CDR of both the accused contacted with each other during occurrence. (statement attached herewith for ready reference please).

3. Accused Nazir s/o Laiq Shah and Mst. Parveen Bibi were released on bail by the court and called to join / attend the inquiry proceedings. Both were summoned repeatedly through concerned police station. However, compliance report received on the summon that both were not present in their place and has gone to out of district. (report attached herewith for ready reference please).

4. To verify summon compliance reports issued in different dates by the undersigned office, concerned DFC Jamshaid No. 655 of PC Lachi was summoned for appearance, recorded

ATTESTED

11/06/18

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mobile numbers but they showed their position out of District Faisalabad & Islamabad. ASI Abdullah and IHC Sahfi Ullah were also made tracing of both accused but could not found / not showed interest in Inquiry proceedings. (summon attached herewith for ready reference please)

5. During the inquiry process, to determine facts and validity of the statement of the defaulter ASI Walibat was summoned again for cross examination, question answers which were also placed in file after duly signed and attestation. He was given full opportunity to defend himself. (Cross examination attached herewith for ready reference please).

6. In order to dig out the facts the following witnesses were called and examined in presence of accused official, who was provided ample opportunity to monitor the witnesses: (1) SHO Thair Nawaz (2) Constable Lal Zada No. 512 (3) DFC Jamshaid No. 655 (4) Constable Kasif Saeed No. 988 (5) Constable Mohammad Nazar No. 1376 (6) Constable Mohammad Qasim No. 702. (Statements attached herewith for ready reference please).

During the inquiry process accused official was cross examined (which is also attached herewith for ready reference please)

(CONCLUSION)

Keeping in view abovementioned facts and available record in hand, I came to the conclusion that though contraband / chars may be recovered from Mst. Parveen Bibi but involving Nazir s/o Laiq Zaman in criminal case u/s 3/4 PEHO seems dubious and illegal in nature. ASI/SHO instead of tracing the source of purchase of contraband / chars he charged and arrested on his ill-will Nazir s/o Laiq Zaman for his own personal gain. Involvement of SHO Tahir Nawaz in this activity cannot be ruled out. It is, therefore, suggested that he may be dealt with separate departmental proceedings. Accused involved in criminal case in abovementioned FIR may defend themselves in the court of law on merit without using this departmental inquiry.

In the light of above, the undersigned is of the view that accused Walibat Khan ASI misused his authority for his personal gain and indulged himself in extra departmental activities and committed professional gross misconduct.

Therefore, accused official Walibat Khan ASI is recommended for major punishment under the ibid rules.

Submitted please.

DPO Kohat

Enquiry Officer
Superintendent of Police,
Operations Kohat

11/06/18.

ATTESTED



OFFICE OF THE
DISTRICT POLICE OFFICER,
KOHAT

Tel: 0922-9260116 Fax 9260125

No 6196-98/PA dated Kohat the 27/6/2018

ORDER

This order is passed on the departmental enquiry against ASI Walibat Shah under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

Brief facts of the case are that he while posted at PS Lachi lodged a fabricated report incorporated vide FIR No. 240 dated 13.05.2018 u/s 3/4 PO, PS Lachi for his personal gain.

ii. That he was found ill reputed and indulged himself in extra departmental activities.

He was served with Charge Sheet & Statement of Allegations. Mr. Jamil Akhtar SP Operations, Kohat was appointed as enquiry officer to proceed against him departmentally. The enquiry officer submitted finding report and found him guilty of the charges leveled against him.

He was called in O.R and heard in person. His reply was perused and found unsatisfactory.

In view of the above and available record, I agreed with the finding of enquiry officer, therefore, in exercise of powers conferred upon me under the **rules ibid I**, Abbas Majeed Khan Marwat, District Police Officer, Kohat impose a major punishment of **reduction from higher stage to lower stage in the same time scale of pay for the period of 03 years** on accused ASI Walibat Shah. He is reinstated in service from the date of his suspension.

Order Announced
24.06.2018

OB No. 722
Date 25-6/2018

No 6196-98/PA dated Kohat the 27-6-2018.

Copy of above is submitted for favour of information to the:-

Regional Police Officer Kohat w/r to W/DIG HQrs
Ends: No. 981-83 dated 14.05.2018 & your Ends:
No. 6481/EC dated 30.05.2018 please
Reader/Pay Officer/SRC/OHC for necessary action.

ATTESTED 2.


DISTRICT POLICE OFFICER,
KOHAT


DISTRICT POLICE OFFICER,
KOHAT

To

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The Regional Police Officer,
Kohat Region, Kohat.

Through PROPER CHANNEL
Subject: REPRESENTATION

Respected Sir,

FACTS

1. It is submitted that petitioner was posted as ASI Incharge Lachi Toll Plaza Nakabandi and was performing his official duties with entire satisfaction of his senior / superior officers.
2. That on 13.05.2018, a lady namely Perveen was found with suspicious activities by the Police constable namely Kashif posted at Nakabandi.
3. She was verbally interrogated. During verbal interrogation, 120 Grams chars were trickle down from her hand and were taken into position by Police constable named above at the spot.
4. That during timely inquiry she told to Police constable that she had brought the same "Chars" to Nazir Pump Monitor situated at the front of Nakabandi Point.
5. That on the same day and time applicant was present at PS Lachi in connection with some official work.
6. That constable Kashif called to constable Lal Zada who was present with me at PS Lachi that a lady in possession of 120 Grams "Chars" have been arrested.
7. That on receipt of call applicant immediately rush to the Nakabandi point and lady Pervin was interrogated.
8. She once again stated that she had brought the same "Chars" to the above named "Pump Monitor".
9. That applicant has brought the event in the notice of SHO Lachi Tahir Nawaz Khan through mobile phone.
10. That SHO has come to the spot and inquiry was made from her. She stated her previous version to SHO PS Lachi.
11. That applicant has arrested both the accused on the order of SHO PS Lachi on the charges of $\frac{3}{4}$ Prohibition Order.
12. That proper case vide FIR No. 240 dated 13.05.2018 has been registered against both the accused.


ATTESTED

That on 14.5.2018 District Police Officer Kohat has charge sheeted applicant for the allegation that:

- I. That applicant while posted at PS Lachi lodged a fabricated report incorporate vide FIR No. 240, dated 13.05.2018 u/s 34 PO PS Lachi for personal gain.
- II. That applicant have found ill-reputed and indulged himself in extra departmental activities. Copy of charge sheet is enclosed herewith.

- 14. That applicant has submitted plausible reply to the inquiry officer. Copy of reply is attached herewith.
- 15. That enquiry officer submitted his findings and petitioner was made guilty of the charges.
- 16. That consequently District Police Officer Kohat has imposed major punishment of reduction form higher rank to lower stage in the same time scale of pay for the period of three years. Copy of finding is attached.
- 17. Hence this representation is submitted on the following ground:


GROUND

- 1. That petitioner has submitted plausible reply in response to the charge sheet.
- 2. That a link of both the accused has proved during enquiry. Both have connected to each other through their mobile numbers i.e 0335-5225803 -0335-8633525. In this regard CDR report has been acquired and attached herewith.
- 3. That constables Kashif, Lal Zada, Jamshad DFC, Muhammad Qasim and Muhammad were present at spot and recorded his statement during enquiry in support of applicant. Theirs states are attached herewith.
- 4. That both accused / complainant Nazir were time and again called for enquiry proceedings but they did not turn up for enquiry proceedings.
- 5. That said Nazir Pumb Monitor has threaten the applicant and his colleagues for dire consequences during his arrest in the premises of Police station.
- 6. That applicant has no any kind of enmity with accused. Even applicant does not know and recognize both the accused.
- 7. That at the same time applicant was not present at the spot but was present at PS Lachi during the occurrence.
- 8. That about 15 FIRs has been registered in PS Lachi against narcotic peddlers and armed smugglers on "Murasilla submitted by applicant during his short period of 45 days which shows the good efficiency of applicant.


ATTESTED

- 9. That I have taken action at the behest of competent authority i.e SHO PS Lachi.
- 10. That District Police officer Kohat has not properly evaluated the charges leveled against applicant.
- 11. That District Police Officer Kohat has awarded harsh punishment by awarded reduction form higher rank to lower stage in the same time scale of pay for the period of three years to petitioners.
- 12. That petitioner has small kids and he is the only breadwinner of the family.
- 13. That the above mentioned punishment is not less than snatching of bread from the mouth of his little kids.
- 14. That the above punishment has badly disturbed the monthly budget of his family.
- 15. That the same punishment has badly discouraged the applicant against anti social elements.

In view of the above facts and grounds, it is requested that impugned order issued vide District Police officer Kohat office OB No. 722 dated 25.06.2018, may please be set aside and major punishment of reduction form higher rank to lower stage in the same time scale of pay for the period of three years of the applicant may please be restored.


 (Wali Bat Khan)
 ASI Kohat Region Kohat

6-7-2018


ATTESTED

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POLICE DEPTT:

KOHAT REGION

ORDER.

This order will dispose of a departmental appeal, moved by ASI Wali Bat of Kohat district Police, presently closed to CPO Peshawar, against the punishment order, passed by DPO Kohat vide OB No. 722, dated 25.06.2018 whereby he was awarded punishment of time-scale for the period of three years.

He preferred the instant appeal before the undersigned, upon which comments were obtained from DPO Kohat and his service record was perused. He was also heard in person in orderly room held in this office on 01.08.2018 and crossly examined. He did not advance any plausible explanation in his defense.

Record indicates that the appellant incorporated fake / fabricated case into FIR No. 240 dated 13.05.2018 u/s 3/4 PO PS Lachi and thus misused his official authority. The allegations leveled against him are proved beyond any shadow of doubt. The order of time-scale is justified. His appeal is hereby rejected.

Order Announced
01.08.2018

(MUHAMMAD HAZ KHAN) PSP
Region Police Officer,
Kohat Region.

No. 8463 /EC, dated Kohat the 6/08 /2018.

Copy for information and necessary action to the District Police Officer, Kohat w/r to his office Memo: No. 16669/LB, dated 20.07.2018. His Service Record i.e. 02 Service Books, 01 Service Roll alongwith Fauji Missal / Enquiry File is returned herewith.


SRE/Pol/Lead

for action (MUHAMMAD HAZ KHAN) PSP
Region Police Officer,
Kohat Region.

ATTESTED



IMEI	A Number	B Number	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
352207095012040	923355225803	923333303030	08-05-18 3:05	08-05-18 3:05	0	INCOMING	SMS	Mandori - MANDORI
352207095012040	923355225803	923333303030	08-05-18 6:45	08-05-18 6:45	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923339629619	08-05-18 6:46	08-05-18 6:46	36	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	08-05-18 6:55	08-05-18 6:55	9	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	08-05-18 6:56	08-05-18 6:57	17	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	08-05-18 9:14	08-05-18 9:14	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	08-05-18 9:14	08-05-18 9:14	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	08-05-18 9:14	08-05-18 9:14	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	08-05-18 9:14	08-05-18 9:14	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923333303030	08-05-18 9:17	08-05-18 9:17	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	08-05-18 9:18	08-05-18 9:18	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	08-05-18 9:18	08-05-18 9:18	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	08-05-18 9:18	08-05-18 9:18	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923333303030	08-05-18 9:19	08-05-18 9:19	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923328503129	08-05-18 9:19	08-05-18 9:20	62	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923357749358	08-05-18 9:42	08-05-18 9:48	346	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923353535462	08-05-18 9:55	08-05-18 9:55	0	INCOMING	SMS	Mandori - MANDORI
352207095012040	923355225803	923333303030	08-05-18 9:59	08-05-18 9:59	0	INCOMING	SMS	Mandori - MANDORI
352207095012040	923355225803	923350816465	08-05-18 10:00	08-05-18 10:11	649	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923119075751	08-05-18 10:48	08-05-18 10:54	370	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923333303030	08-05-18 10:48	08-05-18 10:48	0	INCOMING	SMS	LACHI - LACHI
352207095012040	923355225803	923328503129	08-05-18 12:37	08-05-18 12:38	33	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	08-05-18 12:39	08-05-18 12:45	367	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923329796681	08-05-18 13:08	08-05-18 13:11	219	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923358009761	08-05-18 13:28	08-05-18 13:31	176	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923357749358	08-05-18 13:32	08-05-18 13:35	199	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	08-05-18 13:37	08-05-18 13:37	0	INCOMING	SMS	Mandori - MANDORI
352207095012040	923355225803	923333020091	08-05-18 13:39	08-05-18 13:41	106	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923469276291	08-05-18 13:57	08-05-18 13:58	49	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923469276291	08-05-18 13:58	08-05-18 14:00	90	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923333303030	08-05-18 14:00	08-05-18 14:00	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923469276291	08-05-18 14:02	08-05-18 14:09	396	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923469276291	08-05-18 14:12	08-05-18 14:15	201	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923333303030	08-05-18 15:48	08-05-18 15:48	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	08-05-18 15:50	08-05-18 15:57	393	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665236	08-05-18 15:57	08-05-18 16:05	489	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	08-05-18 16:16	08-05-18 16:38	1297	INCOMING	VOICE	Lachi Bazar - LACHI


 INTERESTED

IMEI	A Number	B Number	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
352207095012040	923355225803	923330955910	08-05-18 16:20	08-05-18 16:20	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923329665236	08-05-18 16:53	08-05-18 16:54	96	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665236	08-05-18 17:34	08-05-18 17:34	12	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665236	08-05-18 17:35	08-05-18 17:35	14	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923333303030	08-05-18 17:36	08-05-18 17:36	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923119389828	08-05-18 17:57	08-05-18 17:59	136	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923345578506	08-05-18 18:06	08-05-18 18:07	90	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	08-05-18 18:07	08-05-18 18:08	31	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923345578506	08-05-18 18:08	08-05-18 18:08	1	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	08-05-18 18:08	08-05-18 18:15	412	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	08-05-18 18:15	08-05-18 18:16	50	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923354825325	08-05-18 18:17	08-05-18 18:17	14	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923354825325	08-05-18 18:18	08-05-18 18:20	113	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923354825325	08-05-18 18:21	08-05-18 18:21	9	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	08-05-18 18:22	08-05-18 18:32	545	OUTGOING	VOICE	LACHI - LACHI
352207095012040	923355225803	923328503129	08-05-18 18:32	08-05-18 18:32	2	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923328503129	08-05-18 18:32	08-05-18 18:33	39	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923354825325	08-05-18 18:47	08-05-18 19:08	1275	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	08-05-18 19:09	08-05-18 19:16	408	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923345578506	08-05-18 20:12	08-05-18 20:12	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923339553156	08-05-18 20:30	08-05-18 20:48	1085	OUTGOING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923339553156	08-05-18 20:48	08-05-18 20:48	11	OUTGOING	VOICE	LACHI - LACHI
352207095012040	923355225803	923339553156	08-05-18 20:49	08-05-18 21:02	779	OUTGOING	VOICE	LACHI - LACHI
352207095012040	923355225803	923328503129	08-05-18 21:02	08-05-18 21:04	131	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	08-05-18 21:13	08-05-18 21:13	18	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923328503129	08-05-18 21:13	08-05-18 21:13	9	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	08-05-18 21:13	08-05-18 21:19	347	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923328503129	08-05-18 21:20	08-05-18 21:20	10	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	08-05-18 21:20	08-05-18 21:21	39	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923345578506	08-05-18 21:27	08-05-18 21:29	75	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923328503129	08-05-18 21:29	08-05-18 21:29	9	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	08-05-18 21:33	08-05-18 21:33	8	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	08-05-18 21:35	08-05-18 21:35	7	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923339553156	08-05-18 21:54	08-05-18 21:54	32	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923339553156	08-05-18 21:57	08-05-18 22:17	1170	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923360567996	08-05-18 22:17	08-05-18 22:21	249	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923339553156	08-05-18 22:38	08-05-18 23:09	1878	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	09-05-18 5:41	09-05-18 5:43	73	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923339553156	09-05-18 6:47	09-05-18 6:58	623	OUTGOING	VOICE	LACHI - LACHI

Call ID	Number	Number	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
352207095012040	923355225803	923339553156	09-05-18 6:58	09-05-18 7:14	991	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923339553156	09-05-18 7:22	09-05-18 7:26	247	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923345578506	09-05-18 7:44	09-05-18 7:45	36	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923345578506	09-05-18 7:47	09-05-18 7:47	23	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923345578506	09-05-18 7:48	09-05-18 8:06	1136	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	09-05-18 8:19	09-05-18 8:20	16	OUTGOING	VOICE	LACHI - LACHI
352207095012040	923355225803	923354825325	09-05-18 8:33	09-05-18 8:33	6	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923333303030	09-05-18 8:44	09-05-18 8:53	519	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923333303030	09-05-18 8:44	09-05-18 8:44	0	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	09-05-18 8:54	09-05-18 9:04	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	09-05-18 9:04	09-05-18 9:06	570	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923354825325	09-05-18 9:08	09-05-18 9:06	77	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923354825325	09-05-18 9:08	09-05-18 9:11	227	OUTGOING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923354825325	09-05-18 9:13	09-05-18 9:13	12	OUTGOING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923354825325	09-05-18 9:26	09-05-18 9:28	130	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923354825325	09-05-18 9:28	09-05-18 9:31	150	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923329665147	09-05-18 9:39	09-05-18 9:39	150	OUTGOING	VOICE	LACHI - LACHI
352207095012040	923355225803	923354825325	09-05-18 9:41	09-05-18 9:39	6	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923354825325	09-05-18 9:41	09-05-18 9:41	1	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	09-05-18 9:42	09-05-18 9:43	32	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	09-05-18 10:09	09-05-18 10:31	1288	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923339553156	09-05-18 10:26	09-05-18 10:26	0	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923319038922	09-05-18 10:31	09-05-18 10:33	139	INCOMING	SMS	Mandori - MANDORI
352207095012040	923355225803	923354825325	09-05-18 10:39	09-05-18 10:42	171	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923328503129	09-05-18 10:47	09-05-18 10:49	105	OUTGOING	VOICE	LACHI - LACHI
352207095012040	923355225803	923354825325	09-05-18 10:50	09-05-18 10:49	105	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923319038922	09-05-18 11:32	09-05-18 10:50	21	OUTGOING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923345578506	09-05-18 11:32	09-05-18 11:32	0	INCOMING	SMS	Mandori - MANDORI
352207095012040	923355225803	923345578506	09-05-18 11:33	09-05-18 11:33	31	INCOMING	SMS	Mandori - MANDORI
352207095012040	923355225803	923354825325	09-05-18 11:35	09-05-18 11:39	254	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923345578506	09-05-18 11:39	09-05-18 11:40	53	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923333303030	09-05-18 11:45	09-05-18 11:45	0	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923345578506	09-05-18 11:45	09-05-18 11:45	0	INCOMING	SMS	LACHI - LACHI
352207095012040	923355225803	923339553156	09-05-18 11:45	09-05-18 12:01	924	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923339553156	09-05-18 13:29	09-05-18 13:29	0	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923354825325	09-05-18 13:46	09-05-18 13:46	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923358633525	09-05-18 15:07	09-05-18 15:08	60	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923358633525	09-05-18 15:08	09-05-18 15:12	225	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	09-05-18 16:02	09-05-18 16:34	225	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	09-05-18 16:36	09-05-18 16:34	1878	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923339553156	09-05-18 16:37	09-05-18 16:36	1	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923339553156	09-05-18 16:37	09-05-18 16:37	0	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	09-05-18 16:38	09-05-18 16:38	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	09-05-18 16:38	09-05-18 16:38	1	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	09-05-18 16:38	09-05-18 16:38	11	INCOMING	VOICE	Lachi Bazar - LACHI

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352207095012040 923355225803 923329665236 08-05-18 16:20 08-05-18 16:20
 352207095012040 923355225803 923329665236 08-05-18 17:34 08-05-18 16:54
 352207095012040 923355225803 923329665236 08-05-18 17:34 08-05-18 16:54
 Call Duration Call Type Type Location - A
 0 INCOMING

IMEI	A Number	B Number	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
352207095012040	923355225803	923350816465	09-05-18 16:39	09-05-18 16:39	2	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	09-05-18 16:42	09-05-18 16:43	97	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	09-05-18 16:45	09-05-18 16:47	82	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	09-05-18 16:49	09-05-18 17:00	677	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923333303030	09-05-18 17:50	09-05-18 17:50	0	INCOMING	SMS	Mandori - MANDORI
352207095012040	923355225803	923354825325	09-05-18 17:50	09-05-18 17:52	139	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923059182325	09-05-18 17:53	09-05-18 17:55	112	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923350816465	09-05-18 17:59	09-05-18 18:01	117	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	09-05-18 18:02	09-05-18 18:02	9	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	09-05-18 18:03	09-05-18 18:04	55	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	09-05-18 18:29	09-05-18 18:35	378	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	09-05-18 18:36	09-05-18 19:15	2365	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	09-05-18 18:49	09-05-18 18:49	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923328503129	09-05-18 19:44	09-05-18 19:45	57	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923360567996	09-05-18 20:12	09-05-18 20:22	601	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923350816465	09-05-18 20:30	09-05-18 20:31	43	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923339553156	09-05-18 21:08	09-05-18 21:08	14	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923339553156	09-05-18 21:08	09-05-18 21:14	349	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	09-05-18 21:14	09-05-18 21:43	1727	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923345578506	09-05-18 21:44	09-05-18 21:44	11	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923339553156	09-05-18 21:44	09-05-18 22:00	984	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	09-05-18 22:00	09-05-18 22:01	11	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	09-05-18 22:01	09-05-18 22:05	240	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923339553156	09-05-18 22:08	09-05-18 22:12	245	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923350816465	09-05-18 22:12	09-05-18 22:14	141	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923339553156	09-05-18 22:16	09-05-18 22:41	1514	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923339553156	09-05-18 22:47	09-05-18 22:58	660	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923339553156	09-05-18 23:02	09-05-18 23:07	313	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923350816465	09-05-18 23:35	09-05-18 23:35	19	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923333303030	09-05-18 23:55	09-05-18 23:55	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923333303030	10-05-18 7:20	10-05-18 7:20	0	INCOMING	SMS	LACHI - LACHI
352207095012040	923355225803	923329665147	10-05-18 7:20	10-05-18 7:20	0	INCOMING	SMS	LACHI - LACHI
352207095012040	923355225803	923329665147	10-05-18 7:20	10-05-18 7:20	0	INCOMING	SMS	LACHI - LACHI
352207095012040	923355225803	923348336051	10-05-18 7:27	10-05-18 7:29	134	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	10-05-18 7:31	10-05-18 7:33	82	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923354825325	10-05-18 8:14	10-05-18 8:14	32	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	10-05-18 8:43	10-05-18 8:44	73	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923345578506	10-05-18 9:01	10-05-18 9:01	0	INCOMING	SMS	Mandori - MANDORI

TIME	A Number	B Number	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
352207095012040	923355225803	923348336051	10-05-18 9:20	10-05-18 9:21	25	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923358633525	10-05-18 9:41	10-05-18 9:44	159	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923358633525	10-05-18 9:45	10-05-18 9:48	145	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923354825325	10-05-18 9:50	10-05-18 9:51	38	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923333020091	10-05-18 11:09	10-05-18 11:10	33	OUTGOING	VOICE	LACHI - LACHI
352207095012040	923355225803	923354825325	10-05-18 11:48	10-05-18 11:48	0	INCOMING	SMS	Mandori - MANDORI
352207095012040	923355225803	923333020091	10-05-18 12:09	10-05-18 12:21	764	OUTGOING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923358633525	10-05-18 12:43	10-05-18 12:45	138	OUTGOING	VOICE	LACHI - LACHI
352207095012040	923355225803	923348336051	10-05-18 12:50	10-05-18 12:50	15	OUTGOING	VOICE	LACHI - LACHI
352207095012040	923355225803	923348336051	10-05-18 12:50	10-05-18 12:52	87	OUTGOING	VOICE	LACHI - LACHI
352207095012040	923355225803	923348336051	10-05-18 13:09	10-05-18 13:10	47	OUTGOING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923348336051	10-05-18 13:56	10-05-18 13:56	17	OUTGOING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923348336051	10-05-18 14:18	10-05-18 14:18	13	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923360567996	10-05-18 14:18	10-05-18 14:20	72	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923348336051	10-05-18 14:24	10-05-18 14:24	7	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923358633525	10-05-18 14:27	10-05-18 14:29	89	OUTGOING	VOICE	LACHI - LACHI
352207095012040	923355225803	923349603929	10-05-18 14:45	10-05-18 14:45	0	INCOMING	SMS	Village Chichina - VILLAGE CHICHINA & SURROUNDINGS
352207095012040	923355225803	923358633525	10-05-18 15:06	10-05-18 15:07	22	OUTGOING	VOICE	N/A - KOHAT
352207095012040	923355225803	923354825325	10-05-18 15:10	10-05-18 15:10	0	INCOMING	SMS	Babi Zai - KOHAT
352207095012040	923355225803	923358633525	10-05-18 15:10	10-05-18 15:11	52	INCOMING	VOICE	Babi Zai - KOHAT
352207095012040	923355225803	923358633525	10-05-18 15:12	10-05-18 15:13	77	OUTGOING	VOICE	N/A - KOHAT
352207095012040	923355225803	923358009761	10-05-18 15:24	10-05-18 15:24	32	INCOMING	VOICE	N/A - KOHAT
352207095012040	923355225803	923350816465	10-05-18 15:35	10-05-18 15:39	189	INCOMING	VOICE	N/A - KOHAT
352207095012040	923355225803	923350816465	10-05-18 15:39	10-05-18 15:39	12	INCOMING	VOICE	N/A - KOHAT
352207095012040	923355225803	923350816465	11-05-18 5:41	11-05-18 5:42	34	INCOMING	VOICE	N/A - KOHAT
352207095012040	923355225803	923350816465	11-05-18 5:54	11-05-18 5:54	12	INCOMING	VOICE	N/A - KOHAT
352207095012040	923355225803	923350816465	11-05-18 5:54	11-05-18 5:54	11	INCOMING	VOICE	N/A - KOHAT
352207095012040	923355225803	923350816465	11-05-18 5:56	11-05-18 5:56	7	INCOMING	VOICE	N/A - KOHAT
352207095012040	923355225803	923348336051	11-05-18 5:57	11-05-18 5:57	38	INCOMING	VOICE	N/A - KOHAT
352207095012040	923355225803	923348336051	11-05-18 5:58	11-05-18 5:59	55	INCOMING	VOICE	N/A - KOHAT
352207095012040	923355225803	923354825325	11-05-18 6:13	11-05-18 6:13	1	INCOMING	VOICE	N/A - KOHAT
352207095012040	923355225803	923354825325	11-05-18 6:14	11-05-18 6:15	78	INCOMING	VOICE	Dhoda RdKohat 2303_0 - KOHAT
352207095012040	923355225803	923358633525	11-05-18 6:16	11-05-18 6:18	73	INCOMING	VOICE	Bus Stand - KOHAT
352207095012040	923355225803	923354825325	11-05-18 6:18	11-05-18 6:19	61	INCOMING	VOICE	Bus Stand - KOHAT
352207095012040	923355225803	923354825325	11-05-18 6:20	11-05-18 6:21	61	INCOMING	VOICE	Bus Stand - KOHAT
352207095012040	923355225803	923354825325	11-05-18 6:21	11-05-18 6:22	51	INCOMING	VOICE	Bus Stand - KOHAT
352207095012040	923355225803	923354825325	11-05-18 6:22	11-05-18 6:24	109	INCOMING	VOICE	Bus Stand - KOHAT
352207095012040	923355225803	923360567996	11-05-18 7:03	11-05-18 7:05	69	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923354825325	11-05-18 7:05	11-05-18 7:06	68	INCOMING	VOICE	Mandori - MANDORI

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Handwritten signature or initials.

IMEI	A Number	B Number	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
352207095012040	923355225803	923360567996	11-05-18 7:33	11-05-18 7:34	70	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923354825325	11-05-18 8:52	11-05-18 8:52	16	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	11-05-18 8:58	11-05-18 8:59	21	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923360567996	11-05-18 9:00	11-05-18 9:01	46	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	11-05-18 9:34	11-05-18 9:34	14	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923354825325	11-05-18 9:35	11-05-18 9:35	23	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923354825325	11-05-18 9:35	11-05-18 9:36	19	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923354825325	11-05-18 9:36	11-05-18 9:36	14	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923354825325	11-05-18 9:36	11-05-18 9:37	19	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923333303030	11-05-18 11:19	11-05-18 11:19	0	INCOMING	SMS	LACHI - LACHI
352207095012040	923355225803	923357749358	11-05-18 11:21	11-05-18 11:32	673	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923354825325	11-05-18 11:38	11-05-18 11:45	419	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923350816465	11-05-18 11:45	11-05-18 11:47	84	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923357749358	11-05-18 11:46	11-05-18 11:46	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923333303030	11-05-18 17:08	11-05-18 17:08	0	INCOMING	SMS	LACHI - LACHI
352207095012040	923355225803	923345578506	11-05-18 17:08	11-05-18 17:08	0	INCOMING	SMS	LACHI - LACHI
352207095012040	923355225803	923350816465	11-05-18 17:10	11-05-18 17:17	406	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923355289442	11-05-18 17:17	11-05-18 17:17	17	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923355289442	11-05-18 17:18	11-05-18 17:19	76	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923355289442	11-05-18 17:20	11-05-18 17:22	68	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923355289442	11-05-18 17:22	11-05-18 17:22	5	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923333303030	11-05-18 18:13	11-05-18 18:13	0	INCOMING	SMS	LACHI - LACHI
352207095012040	923355225803	923358633525	11-05-18 18:14	11-05-18 18:25	670	OUTGOING	VOICE	LACHI - LACHI
352207095012040	923355225803	923357749358	11-05-18 18:25	11-05-18 18:30	274	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923355289442	11-05-18 18:26	11-05-18 18:26	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923348336051	11-05-18 18:35	11-05-18 18:36	58	OUTGOING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923059182325	11-05-18 18:43	11-05-18 18:43	10	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923059182325	11-05-18 18:43	11-05-18 18:43	9	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923348336051	11-05-18 18:47	11-05-18 18:48	15	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923333303030	11-05-18 19:06	11-05-18 19:06	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923357749358	11-05-18 19:21	11-05-18 19:21	0	INCOMING	SMS	Mandori - MANDORI
352207095012040	923355225803	923329665147	11-05-18 19:50	11-05-18 19:50	11	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923329665147	11-05-18 19:50	11-05-18 19:51	22	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	11-05-18 19:51	11-05-18 19:51	8	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	11-05-18 19:51	11-05-18 19:52	11	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923329665147	11-05-18 19:52	11-05-18 20:04	724	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923353535462	11-05-18 20:07	11-05-18 20:08	84	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923350816465	11-05-18 20:25	11-05-18 20:46	1220	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923328503129	11-05-18 20:46	11-05-18 20:47	67	INCOMING	VOICE	Lachi Bazar - LACHI

IMEI	A Number	B Number	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
352207095012040	923355225803	923350816465	11-05-18 20:56	11-05-18 21:09	780	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923358633525	11-05-18 21:09	11-05-18 21:10	14	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923358633525	11-05-18 21:10	11-05-18 21:33	1380	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923353535462	11-05-18 21:22	11-05-18 21:22	0	INCOMING	SMS	LACHI - LACHI
352207095012040	923355225803	923059182325	11-05-18 21:34	11-05-18 21:35	73	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	11-05-18 21:36	11-05-18 21:47	684	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923328503129	11-05-18 21:47	11-05-18 21:47	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923345578506	11-05-18 21:50	11-05-18 21:51	74	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923350816465	12-05-18 5:38	12-05-18 5:40	107	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923348336051	12-05-18 6:05	12-05-18 6:09	239	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923355289442	12-05-18 7:41	12-05-18 7:43	152	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923333303030	12-05-18 7:41	12-05-18 7:41	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923360567996	12-05-18 7:44	12-05-18 7:49	295	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923360567996	12-05-18 7:52	12-05-18 7:55	174	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923360567996	12-05-18 7:55	12-05-18 7:55	12	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923360567996	12-05-18 8:05	12-05-18 8:07	87	OUTGOING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923355471434	12-05-18 8:11	12-05-18 8:11	39	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923360567996	12-05-18 8:41	12-05-18 8:43	121	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923353157330	12-05-18 9:05	12-05-18 9:09	252	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923360567996	12-05-18 9:29	12-05-18 9:36	456	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923353157330	12-05-18 9:41	12-05-18 9:42	58	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923369176106	12-05-18 9:48	12-05-18 9:49	63	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923348336051	12-05-18 9:50	12-05-18 9:51	87	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923360567996	12-05-18 9:54	12-05-18 9:56	112	OUTGOING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923369176106	12-05-18 9:59	12-05-18 9:59	33	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923350816465	12-05-18 10:00	12-05-18 10:13	790	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923348336051	12-05-18 10:35	12-05-18 10:36	45	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923369176106	12-05-18 10:41	12-05-18 10:43	102	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923360567996	12-05-18 11:33	12-05-18 11:33	29	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923348336051	12-05-18 11:35	12-05-18 11:36	36	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923369176106	12-05-18 11:37	12-05-18 11:37	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923348336051	12-05-18 11:40	12-05-18 11:41	88	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923339553156	12-05-18 11:42	12-05-18 11:43	15	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923353157330	12-05-18 11:45	12-05-18 11:49	258	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923360567996	12-05-18 11:53	12-05-18 12:06	790	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923358633525	12-05-18 12:06	12-05-18 12:16	600	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923348336051	12-05-18 12:21	12-05-18 12:21	10	OUTGOING	VOICE	LACHI - LACHI
352207095012040	923355225803	923329665147	12-05-18 12:38	12-05-18 12:39	6	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923348336051	12-05-18 12:39	12-05-18 12:39	7	OUTGOING	VOICE	Lachi Bazar - LACHI

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IMEI
352207095012040
352207095012040

IMEI	A Number	B Number	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
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352207095012040	923355225803	923360567996	12-05-18 12:51	12-05-18 12:51	28	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923329665147	12-05-18 12:51	12-05-18 12:51	8	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923329665147	12-05-18 13:13	12-05-18 13:14	10	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923348336051	12-05-18 13:14	12-05-18 13:15	51	OUTGOING	VOICE	LACHI - LACHI
352207095012040	923355225803	923329665147	12-05-18 13:15	12-05-18 13:15	8	INCOMING	VOICE	LACHI - LACHI
352207095012040	923355225803	923329665147	12-05-18 13:25	12-05-18 13:26	11	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	12-05-18 13:44	12-05-18 13:45	43	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	12-05-18 13:48	12-05-18 13:48	7	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	12-05-18 13:48	12-05-18 13:49	12	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923348336051	12-05-18 13:49	12-05-18 13:49	16	OUTGOING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923348336051	12-05-18 13:59	12-05-18 13:59	21	OUTGOING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923333303030	12-05-18 15:30	12-05-18 15:30	0	INCOMING	SMS	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665147	12-05-18 15:30	12-05-18 15:30	0	INCOMING	SMS	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665147	12-05-18 15:30	12-05-18 15:30	0	INCOMING	SMS	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923358633525	12-05-18 15:31	12-05-18 15:32	26	OUTGOING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923358633525	12-05-18 15:33	12-05-18 15:52	1119	INCOMING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923333303030	12-05-18 16:43	12-05-18 16:43	0	INCOMING	SMS	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665147	12-05-18 16:44	12-05-18 16:44	0	INCOMING	SMS	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665236	12-05-18 16:44	12-05-18 16:44	0	INCOMING	SMS	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665147	12-05-18 16:44	12-05-18 16:44	0	INCOMING	SMS	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665236	12-05-18 16:44	12-05-18 16:44	0	INCOMING	SMS	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665236	12-05-18 16:44	12-05-18 16:56	747	OUTGOING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923333303030	12-05-18 17:20	12-05-18 17:20	0	INCOMING	SMS	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923353157330	12-05-18 17:20	12-05-18 17:21	51	OUTGOING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923350816465	12-05-18 17:32	12-05-18 17:33	35	INCOMING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923358633525	12-05-18 18:00	12-05-18 18:01	96	INCOMING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923353157330	12-05-18 18:23	12-05-18 18:24	18	OUTGOING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923353157330	12-05-18 18:51	12-05-18 18:51	33	OUTGOING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665147	12-05-18 18:52	12-05-18 18:52	5	INCOMING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665147	12-05-18 18:53	12-05-18 18:53	5	INCOMING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923353157330	12-05-18 18:54	12-05-18 18:55	20	OUTGOING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665147	12-05-18 18:55	12-05-18 18:55	8	INCOMING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665147	12-05-18 18:56	12-05-18 18:56	12	INCOMING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665147	12-05-18 18:57	12-05-18 19:01	213	OUTGOING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923357749358	12-05-18 19:01	12-05-18 19:01	4	INCOMING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665236	12-05-18 19:02	12-05-18 19:03	25	OUTGOING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923357749358	12-05-18 19:03	12-05-18 19:06	161	OUTGOING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665147	12-05-18 19:06	12-05-18 19:06	5	INCOMING	VOICE	Sumairy Khattak - Sumairy Khattak

IMEI	A Number	B Number	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
352207095012040	923355225803	923357749358	12-05-18 19:11	12-05-18 19:12	69	OUTGOING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665147	12-05-18 19:16	12-05-18 19:16	4	INCOMING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665147	12-05-18 19:17	12-05-18 19:17	4	INCOMING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923329665147	12-05-18 19:23	12-05-18 19:58	2071	OUTGOING	VOICE	Sumairy Khattak - Sumairy Khattak
352207095012040	923355225803	923357749358	12-05-18 20:04	12-05-18 20:04	0	INCOMING	SMS	Mandori - MANDORI
352207095012040	923355225803	923350816465	12-05-18 20:07	12-05-18 20:17	615	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	12-05-18 20:19	12-05-18 20:19	25	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	12-05-18 20:19	12-05-18 20:20	24	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	12-05-18 20:22	12-05-18 20:23	4	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923329665147	12-05-18 20:25	12-05-18 20:26	43	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923333303030	13-05-18 6:07	13-05-18 6:07	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	13-05-18 6:09	13-05-18 6:10	88	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	13-05-18 6:11	13-05-18 6:25	850	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	13-05-18 7:38	13-05-18 7:39	87	INCOMING	VOICE	Mandori - MANDORI
352207095012040	923355225803	923329665147	13-05-18 8:21	13-05-18 8:21	4	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	13-05-18 8:24	13-05-18 8:24	8	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923358633525	13-05-18 8:30	13-05-18 8:35	267	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	13-05-18 8:36	13-05-18 8:36	8	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	13-05-18 8:37	13-05-18 8:37	5	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329062141	13-05-18 8:37	13-05-18 8:37	2	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	13-05-18 8:41	13-05-18 8:41	5	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	13-05-18 8:45	13-05-18 8:45	10	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923072289442	13-05-18 9:24	13-05-18 9:27	197	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329665147	13-05-18 9:27	13-05-18 9:27	5	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923333303030	13-05-18 9:34	13-05-18 9:34	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923369643590	13-05-18 9:38	13-05-18 9:39	46	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923329062141	13-05-18 9:39	13-05-18 9:39	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923072289442	13-05-18 9:46	13-05-18 9:46	40	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923369643590	13-05-18 9:52	13-05-18 9:53	45	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923369643590	13-05-18 9:58	13-05-18 10:00	93	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923358633525	13-05-18 10:06	13-05-18 10:08	117	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923369643590	13-05-18 10:09	13-05-18 10:10	70	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350816465	13-05-18 10:27	13-05-18 10:27	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923369643590	13-05-18 10:27	13-05-18 10:27	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923333303030	13-05-18 11:00	13-05-18 11:00	0	INCOMING	SMS	Lachi Bazar - LACHI
352207095012040	923355225803	923460256180	13-05-18 11:00	13-05-18 11:02	104	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923358009761	13-05-18 11:02	13-05-18 11:05	157	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923350485758	13-05-18 11:05	13-05-18 11:06	38	INCOMING	VOICE	Lachi Bazar - LACHI
352207095012040	923355225803	923358009761	13-05-18 11:47	13-05-18 11:47	0	INCOMING	SMS	Lachi Bazar - LACHI

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IMEI	A Number	B Number	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
352207095012040	923355225803	923369176106	13-05-18 11:58	13-05-18 11:58	44	INCOMING	VOICE	Lachi Bazar - LACHH
352207095012040	923355225803	923350485758	13-05-18 12:04	13-05-18 12:04	0	INCOMING	SMS	Lachi Bazar - LACHH
352207095012040	923355225803	923333303030	13-05-18 12:48	13-05-18 12:48	0	INCOMING	SMS	Lachi Bazar - LACHH
352207095012040	923355225803	923350816465	13-05-18 12:50	13-05-18 12:51	11	INCOMING	VOICE	Lachi Bazar - LACHH
352207095012040	923355225803	923328503129	13-05-18 13:16	13-05-18 13:16	0	INCOMING	SMS	Lachi Bazar - LACHH
352207095012040	923355225803	923333303030	14-05-18 11:11	14-05-18 11:11	0	INCOMING	SMS	Lachi Bazar - LACHH

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Pivot of Cell No. 03355225803, Case FIR 240, PS Lachi

Count of Call-Type	Column Labels					
	INCOMING		INCOMING Total	OUTGOING	OUTGOING Total	Grand Total
Row Labels	SMS	VOICE		VOICE		
923355225803	71	220	291	65	65	356
923354825325	5	41	46	10	10	56
923329665147	14	34	48	4	4	52
923350816465	1	38	39	1	1	40
923333303030	27		27			27
923348336051		9	9	13	13	22
923339553156	3	10	13	8	8	21
923358633525		13	13	16	16	19
923360567996		13	13	3	3	16
923345578506	3	10	13	1	1	14
923328503129	2	9	11	2	2	13
923357749358	3	6	9	2	2	11
923329665236	2	3	5	3	3	8
923353157330				7	7	7
923355289442	1	5	6			6
923369176106	1	3	4	1	1	5
923369643590	1	4	5			5
923358009761	1	3	4			4
923059182325		4	4			4
923469276291		4	4			4
923353535462	2	1	3			3
923333020091		1	1	2	2	3
923329062141	1	1	2			2
923319038922	1	1	2			2
923072289442		2	2			2
923350485758	1	1	2			2
923355471434				1	1	1
923349603929	1		1			1
923119075751		1	1			1
923119389828				1	1	1
923460256180		1	1			1
923339629619		1	1			1
923330955910	1		1			1
923329796681		1	1			1
Grand Total	71	220	291	65	65	356

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Forensic Science Laboratory

Police Investigation, Khyber Pakhtunkhwa
29-B1, Phase 5, Hayatabad, Peshawar

Report of the Government Analyst
For Narcotics & Psychotropic Substances.
(Admissible Evidence under Section 510 Cr. PC and Sec.34/35/47 CNSA 1997)

1. Laboratory No. CE 13-19369-0-18 dated 22-05-2018
Received ONE Sealed Parcels marked as 1
Bearing 3 Seals in the marks of HK
From FC NO: 86 in case:-
F.I.R No. 240 dated 13-05-2018 U/S 4PO P/S LACHI District KOHAT

2. The seals on the Parcels were found intact. The seals were opened in our presence and the parcels contained:-


PARCEL NO. WEIGHT/VOLUME OF THE SUSPECTED SAMPLES

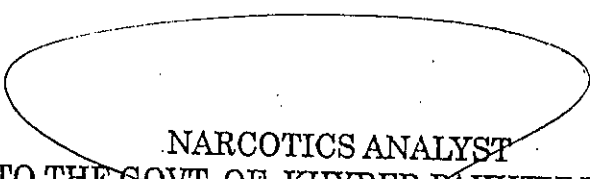
P.NO.1:- =5.0gms.

3. The above articles were duly examined by the undersigned and Remained under our immediate custody until the examination was completed.

OPINION:- The samples in question were subjected to Physical/chemical and instrumental test/analysis (detailed overleaf) revealed that the sample (as defined in the section 2 of the CNSAAct) is:-

IT WAS CHARAS.


CHEMICAL EXPERT
FSL, PESHAWAR



NARCOTICS ANALYST
TO THE GOVT. OF KHYBER PAKHTUNKHWA
GOVT. ANALYST FOR NARCOTICS &
PSYCHOTROPIC SUBSTANCES, FSL, PESHAWAR

No. 12137 /FSL, dated 30-5-18-1

4. The opinion of the Govt Analyst for Narcotics is forwarded to the SP/INV: KOHAT
The receipt may be acknowledged.

NOTE:- This report carries emboss Mark.


ATTESTED


Director
Forensic Science Laboratory
Police Investigation, Khyber Pakhtunkhwa,
Peshawar
Phone No. 091-9217394 Fax 091-9217251

نقلہ ۱۵ روزنامہ ۱۳۱۸

ضلع کوٹا

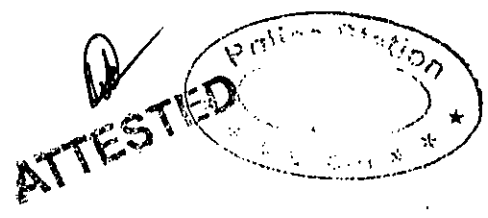
۱۵۔ آمد / منورنگی و کمانڈر آئی۔ مورخ ۱۳۱۸ ۱۱:۰۰ بجے اس وقت
 میں سے آئندہ لعلزادہ 512، کاشف سعید 1188 عم لیدی کا
 صاحبہ بیگم 1178 کو نام بندی سے آیا۔ روپوں تک بندی جانب لادی
 ایدہ برقعہ پوس عورت روڈ کے کنارے آئے ہوئے جھولکے پر
 مذکورہ نے چس گمردہ بھینک دی۔ دریاقت پر مذکورہ نے ایسا نام بیروین ۱۱
 بیہ عنایت شاہ کندہ فتح خان پانڈہ لادی بندہ با چس مند کر ڈکار روزانے
 پر 120 گرام لیسٹل کر جس سے 5 گرام بوضی جزیرہ ۶۷ علیہ اور دریا با علیہ
 مذکورہ بارسل سیریلر کے بیرونی فرد و بیضہ یو لیاں مذکورہ کو لیدی کا کاشف
 صاحبہ 1178 کے زریے گرفتار کرے انٹرو گیت کرنے پر ملزم نے بیجا نام پر چس
 صحنی مذکورہ شخص و دردی تھی خان کندہ میر علی خان نذر توں بلذہ بیرونی علیہ
 کیلئے لے جا رہی تھی۔ مگر مذکورہ بدستھی لئی۔ کہ یو لیاں و لوں کے سامنے آ کر ڈپ کے
 مارے بھینک دیا۔ مقدمہ میں نذر توں گرفتار دار و ریشہ کھڑ کر بلذہ ارمال لقا نازک
 سیر مقدم عدت 2۷۰ روز اور روز ۳۱۷۸ لقا نازک لادی روز و غیر ہو کھایے
 ملزم کو زبردستی لیدی کا کاشف لقا نازک حوالہ دیا گیا۔ جیکہ عالم مقدمہ دست
 طور پر دردی مقرر ہوا۔ اب میں عم لوزی کا مست مذکورہ کے دریاں رو لڈ نازک
 بندی ہوں:

ضلع عالی

نقلہ و لادی لقا نازک

(Handwritten signature)

M. M. Ladd



بیان اذعان کیسٹل لعل ڈارو 512 FC متصفہ لاچی نامہ مندی

میں عمیرہ ولی بیٹ ASI سرکاری کام کے لئے لکھانہ لاچی آئے تھے
کمزور میں دوران کیسٹل کاشف سعید 988 FC نے میرے ذاتی حوالے میں
پہنچا لیا گیا کہ اس عورت کسٹل کے پاس ہے اور لاچی نامہ مندی 110
آگاہ میں نے ولی بیٹ ASI کے نوٹس میں مان لائی اور عمیرہ
ولی بیٹ ASI کسٹل کھانہ ہذا سے لاچی نامہ مندی روانہ ہوا۔ واقعی
نامہ مندی پر اس عورت تھی۔ صلیہ متصفہ سے کیسٹل کاشف سعید نے
میں پہنچا لیا ہے۔ اور میرے وجود میں ولی بیٹ ASI نے لکھانہ

سے نام پوچھا۔ بعد فریڈ نے کیا کہ یہ میرے بیٹے محمد دی ہے
اور میرے بیٹے محمد نے کہا کہ یہ میرے نذر ماحی شخص کے حوالہ کرو اسکے
لکھ ولی بیٹ ASI نے SHO کے نوٹس میں مان لائی موقعہ SHO
پہنچا لیا۔ نذر ماحی عورت نے وہی مان SHO کے لئے کو دی ہے۔
اسکے بعد ولی بیٹ ASI نے طلب میرے شاہد کو آواز کیا اور شاہد کو
بلایا اور میرے شاہد سے پوچھا کہ نذر کون ہے تو شاہد نے کہا کہ طلب
کا مالک ہے اور طلب میں بیٹھا ہے۔ اسکا لکھ SHO کے لئے اور ولی بیٹ ASI

طلب کے لئے اور نذر کو بلکے لکھانہ لاچی نے لیا۔ ہم عدالت میں نے جو
بیان دیا ہے۔ بالکل درست ہے جس پر عدالت میں لکھا ہے۔

[Handwritten signature]

29⁰⁵/₁₈ 18

لعل ڈارو 512 FC 0333/9622414

ATTESTED

True copy
[Signature]
Sub-Station of Police
Cohat

بیان گواہ کیٹیل کا نام خان 702 قلعہ تھانہ لاہور نامہ مذکورہ

میں اور کیٹیل کاٹیل سعید 988 نامہ مذکورہ لاہور کی طرف سے ہے۔
 دوران لاہور کے ایک عورت لاہور کی طرف آ رہی تھی۔
 کیٹیل کاٹیل سعید 988 نے عورت کو دیکھا اور نیک نیتی سے عورت
 سے لڑائی ہوئی اور لڑائی کے دوران عورت گھبرا گئی اور
 گھبراہٹ کے لحاظ سے عورت کے ہاتھوں سے ایک سفید لقمہ گھبرا گیا۔ فوراً
 وہ لقمہ کیٹیل کاٹیل سعید 988 کے آگے آیا۔ جب کہ یہ دیکھا گیا
 لقمہ جس کے پاس تھا۔ گھبراہٹ و اضطراب سے اس نے چاکو چار بانی
 بانی لاہور کے گھبراہٹ سے لقمہ کاٹیل سعید 988 نے اسی طرح کے نوٹس میں
 ولیب آئی۔ عورت سے نام پتہ لیا گیا۔ اور یہاں موجودگی میں
 عورت سے لقمہ لیا گیا اور یہ لقمہ لیا گیا۔ کہ یہ لقمہ
 جس کے عوام کرو۔ اس کے بعد ولیب آئی۔ SHO کے نوٹس میں
 بانی لاہور کے واقعہ SHO کے حاضر آیا۔ عورت نے وہی بانی SHO
 کو دیکھا۔ اس کے بعد ولیب آئی۔ عورت نے وہی بانی SHO
 اور شہداء کو بلا لیا۔ اور وہ لقمہ منجھر شہداء سے لقمہ لیا۔
 تو شہداء کیا کہ وہ لقمہ کا مالک ہے۔ اور وہ لقمہ میں بیٹھا ہے۔
 اس کے بعد SHO اور ولیب آئی۔ دونوں لقمہ لگے۔ اور نذر کو
 لقمہ سے گرفتار کرنے کے لئے ساتھ لقمہ لیا۔ یہ بیان ہے جس
 نے کو بیان انکوائری دفتر کو دیا ہے۔ بالکل درست ہے جس
 پر مبرا درست دستخط ہے۔

العبد محمد حسن

0336-0906536

06-06-18

True copy

Secretary, District Office
Okara

ATTESTED

گواہ کی پیشگی رپورٹ نمبر 1376/FC مختصر قحانہ 83 نامہ بندی

اور اسٹیشن فاسم خان 702/FC، کاشف سعید 988 نامہ بندی

وٹی ایئر کی طرف سے دوران گھوٹی اندر وقوعہ ایک عورت لاپی
ان بلائے کی طرف آرہی تھی۔ جب کیٹیل کاشف سعید 988/FC

کو دیکھا۔ اور علی بنی سے عورت سے پوچھا ماں کی کیا جاری ہے۔
اس دوران عورت گھبرا گئی اور گھبراہٹ کی وجہ سے عورت کے

ہونے سے ایک سفید لٹاخم گھبرا گیا۔ تو فوراً وہ لٹاخم میں صبر سے تھی
عورت و احترام سے ماں کی گویا رہائی پر بٹھایا۔ گھبراہٹ کے بعد کاشف

سعید 988/FC نے انچارج کو نوٹس میں بات رانی۔ جب انچارج وٹی بیٹ آسی
واقعہ آیا۔ اور پھر وہ خود گئی جس وٹی بیٹ آسی نے عورت سے نام لیا

پوچھا کہ پوز کور پہن کیا کم پوز میں صبر سے بیٹھے تھے دیئے اور
صبر سے بیٹھے تھے کیا۔ کم پوز میں نذر بنائی شخص نے حوالہ کرو۔ اس کے

بعد وٹی بیٹ آسی نے SHO کے نوٹس میں بات لائی۔ واقعہ پر SHO
صاحب حاضر آیا۔ عورت نے وہی بات SHO کو دہرائی۔ اس کے بعد وٹی

بیٹ آسی نے طب پیمبر شاہد کو آواز کیا اور شاہد کو بلایا۔ اور
طب پیمبر شاہد سے پوچھا کہ نذر کون ہے۔ تو شاہد نے کہا کہ وہ

طب پیمبر کا مات ہے۔ اور طب میں بٹھا ہے۔ اس کے بعد SHO اور
وٹی بیٹ آسی دونوں طب گئے۔ اور نذر کو گرفتار کر کے کھانے
لے گیا۔ صبر بیان ہے۔ میں نے جو بیان دیا ہے۔ بالکل درست
ہے۔ صبر پیمبر درست دستخط ہے۔

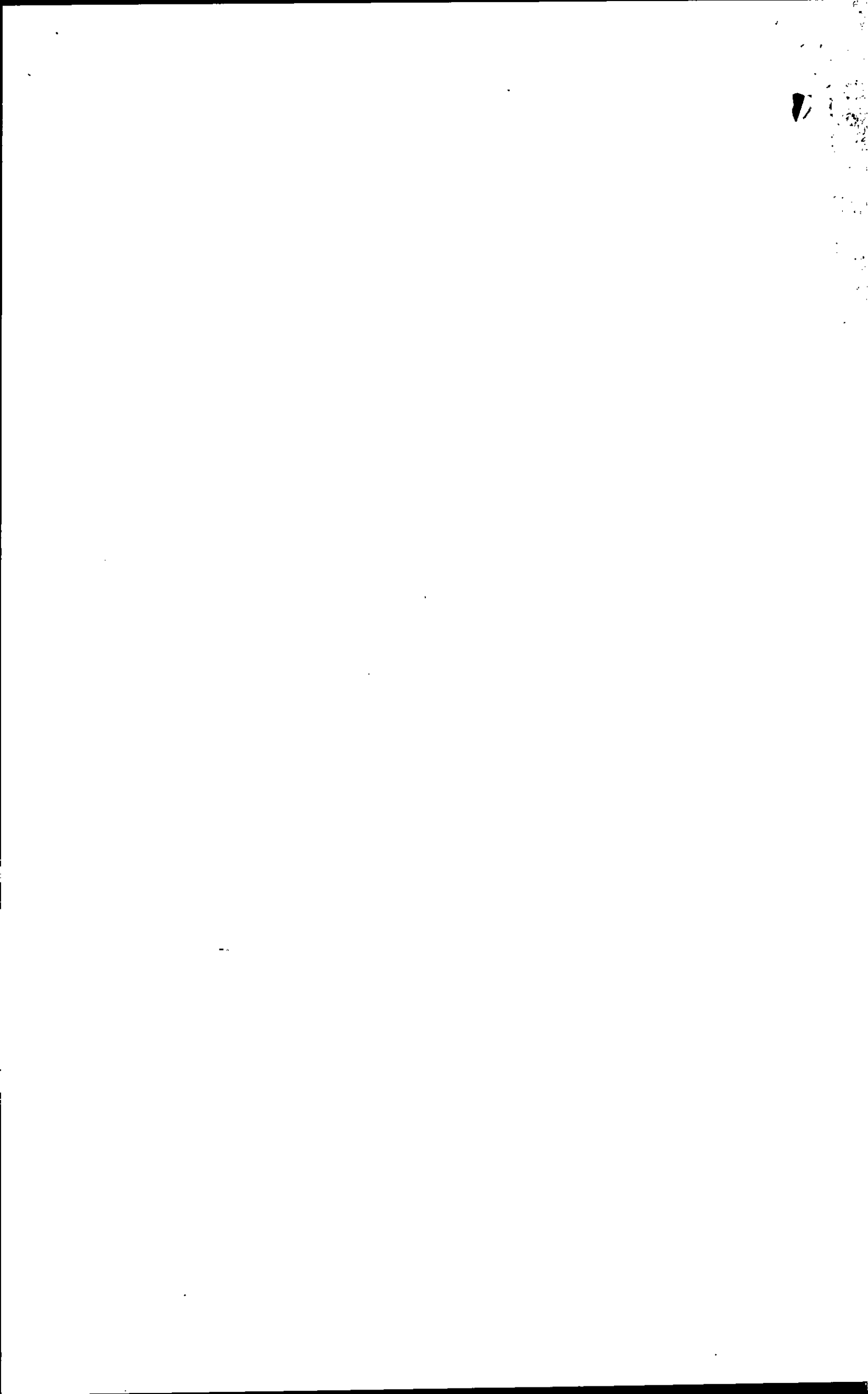
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Department of Police
Operation
Kohat



بہاں اسی کے ٹیبل کاٹھن سے 988 گھانہ لائی نامہ بند

میں اور کینیڈا قاسم خان 702 نامہ بندی ڈیوٹی پر کھڑے تھے کم
 دوران ڈیوٹی ایک عورت ٹول بلازہ کی طرف آ رہی تھی جس میں
 عورت خود دیکھا کم تو میں نے تکتی سے عورت سے پوچھا ماں جی
 کیا تارے ہو۔ تو اس دوران عورت گھبرا گئی اور گھبراہٹ کی وجہ سے
 اسے ایک سفید لٹا کر لیا۔ تو میں نے فوراً وہ لٹا کر اٹھایا جس کے
 پیر دیکھا لٹا کر میں اس سے کہا بعد میں نے عدت و احرام سے ماں جی
 کو جاو رہی ہے پھر اٹھایا پھر اس کے بعد میں اپنے اہل خانہ کو نذر لے کر
 لعل ڈارہ اطلاع دی اور کہا تم آپ لوگ آ جاؤ۔ تو لعل ڈارہ نے
 مجھے کہا تم ہم لائی گھانہ میں ہے۔ میں نے لعل ڈارہ کو سارا واقعہ سنا یا۔
 اور لعل ڈارہ نے مجھے کہا تم ہم لوگ آ رہے ہیں۔ آپ ہمارے آتے ہیں عورت
 کو اپنے پاس نامہ بندی میں بٹھاؤ اور عدت و احرام سے لے کر آئی بت ASI نے
 عدت و احرام سے نام پتہ پوچھا۔ بعد کو ہم نے کہا کم ہم اس میں سے پتہ پتے نے مجھے دی
 اور عدت و احرام سے پتے نے مجھے کہا کم ہم اس میں نذر لے کر آ رہے ہیں تو ہم نے اس کے بعد
 ولی بت ASI نے SHO سے نوٹس میں مان لائی۔ موقع پر SHO
 سے ملنے آیا۔ مذکورہ عورت نے وہی مان SHO سے کو دیا
 اس کے بعد ولی بت ASI نے طلب مندر شاہد کو آواز کیا۔ پھر شاہد کو بلایا
 اور طلب مندر شاہد سے پوچھا کم نذر کون ہے۔ تو شاہد نے کہا کم
 طلب مندر مان ہے۔ اور طلب مندر سے پتہ پتے نے اس کے بعد SHO اور
 ولی بت ASI سے طلب مندر لگے۔ اور نذر کو پتہ پتے نے لگایا۔ پھر اسی
 میں نے جو بیان دیا ہے۔ بالکل درست ہے۔ جس پر عدت و احرام
 شدت ہے

محمد علی

0335-0971757

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DFC
7

بروانہ ہذا کی تفہیل کے سلسلہ میں تزییر کے
پتروں میں جا کر میں تزییر عدم موجود پایا۔ صمیم
بروانہ ہذا کی تفہیل تزییر کے منشی میں رحمان اللہ
میں صحت منابغ تفہیل کی تھی اور تزییر کو پندرہ سو روپے
فون مطلع کیا تھا۔

1-6-18

رحمان اللہ و ملا انان اللہ خان سکھ خاں صاحب

14302 7589413.9
0311. 4878504
0344. 9793216

صمیم

بروانہ ہذا کی تفہیل میں تزییر کے عدم موجودگی میں اس
کے صحت منابغ میں رحمان اللہ سے صحت منابغ تفہیل کی
تھی اور میں تزییر کو پندرہ سو روپے فون مطلع کر دیا ہے
تزییر جو کم جان ہو جو کہ اور دیدہ والیہ طور پر حافظہ میں
تھی ہے۔ اور وہاں پر گتیا صمیم میں ہے کہ اعتباراً مال
کے ساتھ پندرہ سو روپے فون بائے رہا ہوں اور پورے مرنے لے

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Custodian
Kohat

تزییر کو پندرہ سو روپے فون 8633525-0335

صمیم علی

اللہ اعلم

رپورٹ DF کے حالات کو حل ہے
اصل ہذا والیوں اور ان کے

ATTESTE
Siti Lachi
2-6-18

DF Kachi
3-6-18

بیان احوال 3/5/05 محترمہ LHC متصرف گھانہ لاہور
DFC

میں تقریباً 3/4 ماہ سے ٹھیکہ DFC گھانہ لاہور میں تصفیہ میں
تعارف ناموں کو تحریر کیا ہوا ہے نام نذیر ولد لائق شاہ سکرنہ منگلی علی علیہ السلام
داؤد خان حال لاہور @ مسراہ بیرون بھوہ عنایت شاہ سکرنہ منگلی خان
باڑہ لاہور کے نام سے DFC کو لغز میں تصفیہ کرنے دفتر ایس ای
آئی کے دفتر سے مارکی ہوئے تھے۔ جن کے تصفیہ کیلئے من DFC
خود لاہور میں رہنے کے نام سے گیا۔ اور من DFC نے لاہور میں
ذاتی فونائل فون کے نمبروں پر لاہور میں کو مطلع کیا ہے۔ مدینہ علیہ
عبداللہ Asi شفیق اللہ اسی تصفیہ کے سلسلے میں گئے ہیں۔ لیکن
لاہور میں اپنی موجودگی کبھی اسلام آباد فضل آباد، منگلی بیرون گھانہ
ہیں۔ لاہور میں کے موجودگی کی رپورٹ من DFC نے لاہور میں کے
پر لاہور میں۔ اور لاہور کے دفتر سے ارسال کیے ہیں۔ لیکن لاہور میں
تقدیراً اپنی موجودگی چھپاتے ہیں۔ اور انکو آفری صفا میں کسی قسم
کھا دیے ہیں لیکن۔ منگلی اسلام آباد آفری لاہور میں کے
انے کی کوئی قوی امید نہیں ہے۔ لیکن دونوں لاہور میں کو
کا قلمی وقت مانگ کر رہے ہیں۔ مسراہ ہاں ہے جس پر مسراہ
دیکھا گیا ہے۔

Tamir 05/06/18

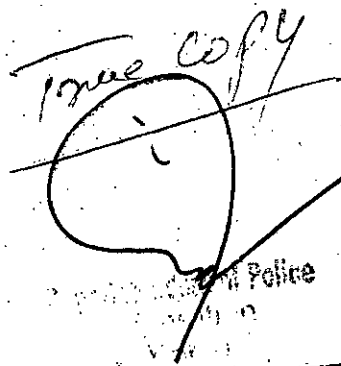
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05/08/18

ATTESTED

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Superintendent of Police
Operation
Kohat

میں مسماہ بیروین کی بی بی زوجہ عفات شاہ کے
بائڑہ فتح خان کو ذاتی طور پر جاننا ہے
دیکھ آئی ہے، جو سرگست خانہ
کوڑھیا ہو کر رہتا ہے۔ لاہور کو کسی
کام کے سلسلے میں جلی گئی ہے۔ آئی
قطع کروں گا

True copy

Police

ناظم محمد اسماعیل

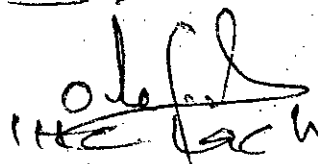

M. ISMAEEL NAZIM
V-C Banda Fateh Khan (Lachi)
14301-2095086-1

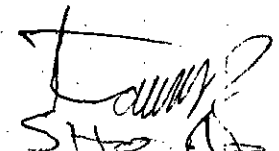
0335-0917733

خیاب عالی
لاہور

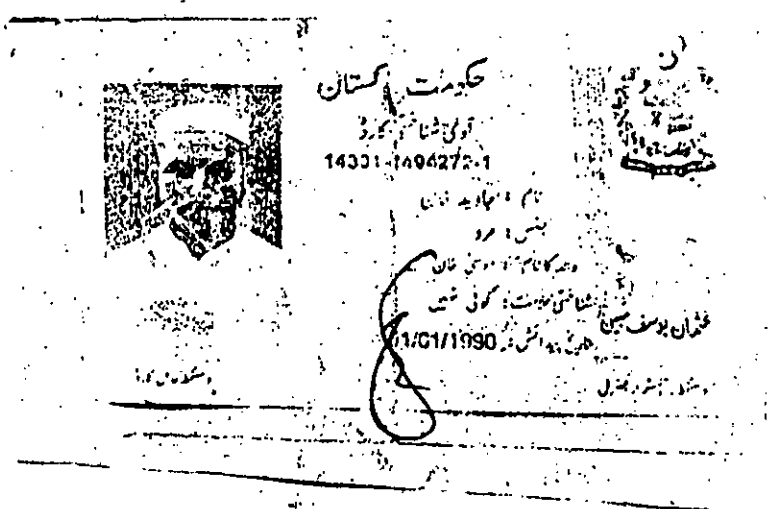
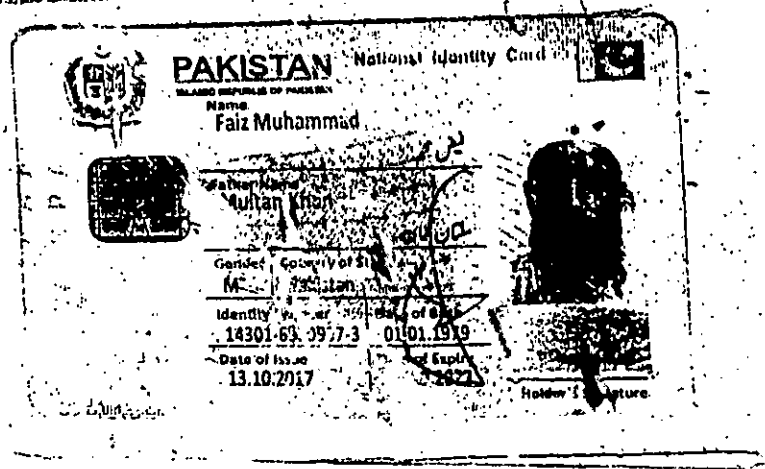
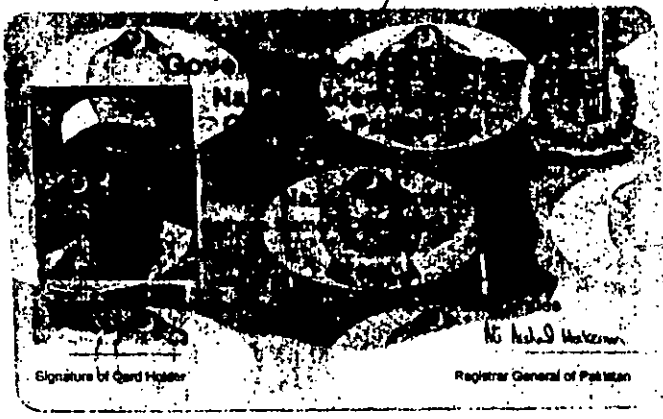
بیروانہ کی لکھنؤ کے سلسلے میں بائڑہ فتح
خان جاکر مسماہ بیروین کی بی بی بی
برادی کرے خانہ کوڑھیا میں عم ہو کر
بیانا ہوا۔ ناظم محمد اسماعیل نے بتلایا کہ
وہ کسی کام کے سلسلے میں لاہور جلی گئی
ہے خانہ کوڑھیا میں ہو کر رہتا ہے کوڑھیا

خیاب عالی
لاہور
مہر علی
والیس


28-5-18
ATTESTED


28-05-2018

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ATTESTED

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ایڈوکیٹ: <u>Shahab Faeem</u>	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
بار کونسل ایسوسی ایشن نمبر: <u>BC-18-5936</u>	
رابطہ نمبر: <u>0308-5387876</u>	

بعدالت جناب: Service Tribunal Peshawar

مخانب: <u>petitioners</u>	دعویٰ: <u>Service appeal</u>
<u>wali bat Khan</u>	علت نمبر: _____
بنام	مورخہ: _____
<u>PPO and others</u>	جرم: _____
	تھانہ: _____

باعت تحریر آتکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
آن مقام میں کیے گئے شہادتیں و حلف نامے و دیگر دستاویزات کی کوئی شکایت
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

Accepted
Appeal

المرقوم: 17/08/18

العبد _____ وَاوَاهُ شَد _____
مقام _____ کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

Shahab

Signature

wali bat Khan s/o Gulbat Khan
R/o Choor Lakki Peshil & Dist.
Kohat.

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service appeal No. 1032/2018

Wali Bat Khan

.....Appellant

VERSUS

Provincial Police Officer/ Inspector General of Police

Khyber Pakhtunkhwa & others

.....Respondents

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4.	Copy of FIR	B	7
5.	Copy of enquiry report	C	8-9

1

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

Service appeal No. 1032/2018
Wali Bat Khan

.....Appellant

VERSUS

Provincial Police Officer / Inspector General of Police
Khyber Pakhtunkhwa & others

..... Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS.

Respectively Sheweth:-

Parawise comments are submitted as under:-

Preliminary Objections:-

- i. That the appellant has got no cause of action.
- ii. That the appellant has got no locus standi.
- iii. That the appeal is not maintainable in the present form.
- iv. That the appellant is estopped to file the instant appeal for his own act.
- v. That the appellant has not come to this Hon: Tribunal with clean hands.
- vi. That the appellant concealed facts from this Honorable Tribunal.
- vii. That the appeal is not maintainable for misjoinder and non-joinder of necessary parties.

FACTS:-

1. Pertains to record, regarding enrollment of appellant. However, his service record is indifferent as he was placed under suspension on different occasions for different charges and awarded punishments for his misconduct.
2. Correct, the appellant was served with charge sheet alongwith statement of allegation for lodging a fabricated case against a women and other person, thus exceeded from his lawful obligations.
3. Incorrect, the charges levelled against the appellant were established by the inquiry officer. Therefore, after fulfilling all codal formalities and his previous conduct, the appellant was awarded a major punishment in accordance with law & rules by respondent No. 3.
4. The departmental appeal of the appellant was processed by the respondent No. 2. The appellant was heard in person on 01.08.2018. His service record was also gone through. However, the appellant failed to advance any plausible explanation for his professional misconduct and the allegations established against the appellant were established by the competent authority. Therefore, the departmental appeal of the appellant was correctly rejected by respondent No. 2.

Grounds:-

- a. Incorrect, both the departmental orders are based on facts and misconduct of the appellant was established against during departmental proceedings. Therefore, the respondents No. 2 & 3 passed legal and speaking orders.
- b. Incorrect, the appellant was proceeded in accordance with law & rules.
- c. Incorrect, the appellant proceeded with departmentally in accordance with law, he was heard and associated with the inquiry proceedings and afforded ample opportunity of defense by the respondent No. 3. Similarly, the appellant also heard in person by the respondent No. 2.
- d. Incorrect, sufficient evidence against the appellant was brought on record by the inquiry officer.
- e. Incorrect, the appellant was proceeded in accordance with law & rules.
- f. Incorrect, all the codal formalities / rules fulfilled during departmental proceedings and disposal of departmental appeal of the appellant. The witnesses were examined in presence of appellant by the inquiry officer. Furthermore, findings of the inquiry officer are based on facts and the charges levelled against the appellant have been established beyond any shadow of doubt.
- g. Incorrect, the witnesses were examined in the presence of the appellant by the inquiry officer.
- h. Incorrect, the departmental inquiry proceedings were conducted in accordance with law & rules. Furthermore, the concerned witnesses were examined.
- i. Pertains to record regarding summons against the victim, however, the inquiry officer collected sufficient evidence in support of charge sheet, the witness was summoned through local Police by the inquiry officer. It was recorded that Mst. Perven widow of Inayat Shah has left her house and shifted to Faisal Abad. Copy is **annexure A**.
- j. Incorrect, the orders have been passed on basis of inquiry report and material available on file.
- k. Incorrect, proper show cause notice was issued to the appellant which was replied by the appellant.
- l. Incorrect, the appellant used unconstitutional / objectionable words i.e "the respondent No. 2 by himself committed misconduct" against the Regional Police Chief i.e respondent No. 2 in the para, which is another professional misconduct.
- m. Irrelevant, the appellant was proceeded for his misconduct detailed in charge sheet and punishment orders.
- n. Incorrect, the service record of the appellant is in different, he was placed under suspension on so many occasions and awarded different kind of punishment including compulsory retirement from service on score of ill reputation. However, he was reinstated in service. In pursuance of Honorable Tribunal judgment dated 07.09.2015 after conducting de-novo proceedings. Furthermore, the appellant used threatened words against the most senior officers / respondents in the last lines of the para.

o. Incorrect, legal and speaking orders are passed by the respondents 2 & 3.
p. Incorrect, the relevant law / rules have been followed during course of departmental proceedings.

Keeping in view of the above, it is submitted that the appeal is without merit and not substantiated. It is, therefore, prayed that the appeal may kindly be dismissed with cost please.

Provincial Police Officer/
Inspector General of Police,
Khyber Pakhtunkhwa,
(Respondent No. 1)

Govt of Khyber Pakhtunkhwa,
through Chief Secretary
(Respondent No. 4)

District Police Officer,
Kohat
(Respondent No. 3)

Deputy Inspector General of Police,
Kohat Region, Kohat
(Respondent No. 2)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service appeal No. 1032/2018
Wali Bat Khan

.....Appellant

VERSUS

Provincial Police Officer / Inspector General of Police
Khyber Pakhtunkhwa & others

..... Respondents

COUNTER AFFIDAVIT

We, the below mentioned respondents, do hereby solemnly affirm and declare on oath that contents of parawise comments are correct and true to the best of our knowledge and belief. Nothing has been concealed from this Hon: Tribunal.

Provincial Police Officer/
Inspector General of Police,
Khyber Pakhtunkhwa,
(Respondent No. 1)

Govt of Khyber Pakhtunkhwa,
through Chief Secretary
(Respondent No. 4)

District Police Officer,
Kohat
(Respondent No. 3)

Deputy Inspector General of Police,
Kohat Region, Kohat
(Respondent No. 2)

50
54

5

مذکورہ صفحات

شاہجہاں آباد ایئر اسٹیشن
01-06-18

سرنام SHO کا نمبر 38

سید اسحاق رضا - ایئر اسٹیشن شاہجہاں آباد

مخبر کیا جا رہا ہے۔ کم آف SHO کو مذکورہ سرنامی سرنام
مطلع کیا جا رہا ہے۔ اس مقام پر دین بیوہ عثمان شاہ سکنر فتح خان بازار
کا کو اطلاع دین۔ اس کے بعد انکو اسٹریٹس (04/06/18) کو فون 10:05 ع
محمد طاہر نے۔

A


سرنامی ایئر اسٹیشن شاہجہاں آباد

کھانا

01-06-18

میں سماء دہون بیوہ صاحبہ صاحبہ کے
 خان بانڈہ کو خانہ حوا کے سرکاری دفتر دار ہے
 حوا کے اپنے بیٹے کے ہمراہ خلیل آباد گئی ہے جسکی
 میں لفٹ لگا کر آھا

DFC
 8840-75-2
 1-6-18

ڈیڑھ ماہ واپس من مکتبہ بانڈہ فتح خان

(Signature)

14301.0151349.5
 0332.9796681

جناب عالی

سماء دہون کے گھر خود بار بار جا کر حوا کے خانہ خود میں موجود نہیں تھی
 ڈیڑھ ماہ سے پہلے حوا کے گھر وہ اپنے بیٹے خالد منظور کے ساتھ خلیل
 آباد گئی ہے۔ جیکر خالد منظور کو بھی ذاتی نوٹس نمبر 03358009761
 پر مقررہ دہی سے مطلع کیا گیا
 لٹھیل حوا کے رپورٹ عرض ہے

جناب عالی

رپورٹ کے ساتھ بالاحصل ہے
 اصل حوا کے نوٹس ارسال ہے

(Signature)
 1-4-18

(Signature)

DFC Jachi
 2-4-18

True Copy
 District of Police
 Operation
 Jachi

Annexure 'c' - 8

(1)

FINDINGS IN DEPARTMENTAL INQUIRY AGAINST
WALIBAT KHAN ASI OF PS LACHI DISTRICT, KOHAT (UNDER SUSPENSION)

FINDINGS

Sir,

It is submitted that the undersigned have been appointed as inquiry officer in departmental inquiry initiated against ASI Walibat Khan of police station Lachi, Kohat who is proceeded with departmentally under KP, Police Rules 1975 (Amended-2014).

The brief of the inquiry is that Walibat Khan ASI (*hereinafter referred accused official*) was served with charge sheet alongwith statement of allegations issued by DPO office vide Memo: No. 4898-99/PA dated 14.05.2018 on charge that while he was posted at police station Lachi lodged a fabricated report incorporated vide FIR No. 240 dated 13.05.2018 u/s 34 PO police station Lachi for his personal gain and he was also found ill reputed and indulged himself in extra departmental activities. Walibat Khan ASI was closed to CPO, Peshawar on above complaint basis vide Order Endst: No. 981-83/E-III dated 14.05.2015, and he was also suspended vide DPO office Order Endst: No. 4900-01/PA dated 14.05.2018. Charge sheet alongwith statement of allegations was served upon accused official. He submitted reply of charge sheet within stipulated period. (statement attached herewith for ready reference please)

For scrutinizing the conduct of ASI Walibat, he was summoned for personal hearing, recorded his statement. In his written reply of charge sheet and summary of allegations he defended himself pleading his innocence. He stated in his written statement that he was present in PS Lachi with constable Lal Zada No. 512 meanwhile information received that a female namely Mst: Parveen Bibi w/o Inayat Shah r/o Fateh Khan Banda Tehsil Lachi, District Kohat bounded in connection with chars at Toll Palaza Naka Bandi, on this information he went to Toll Palaza Nakabandi. He interviewed accused Mst: Parveen Bibi w/o Inayat Shah r/o Fateh Khan Banda Tehsil Lachi, District Kohat and it was disclosed to him that she obtained the recovered chars from her son to hand over to accused Nazir who is running fuel station near the Lachi Toll Palaza. Walibat Khan ASI arrested Accused Mst: Parveen Bibi w/o Inayat Shah r/o Fateh Khan Banda Tehsil Lachi, District Kohat in the meanwhile, SHO Tahir Nawaz arrested accused Nazir s/o Laiq Khan r/o Mir Ali employed in fuel station near Toll Palaza. (statement attached herewith for ready reference please)

2. Former SHO PS Lachi Tahir Nawaz SI was summoned for appearance to find out facts in inquiry proceedings, recorded his statement. He stated in his statement that he received information by ASI Walibat that one female accused bounded at Nakabandi in connection with carrying chars. He gave direction to the ASI Walibat to adopt legal proceedings against the accused. SHO Tahir Nawaz also produced CDR of both the accused contacted with each other during occurrence. (statement attached herewith for ready reference please).

3. Accused Nazir s/o Laiq Shah and Mst: Parveen Bibi were released on bail by the court and called to join / attend the inquiry proceedings. Both were summoned repeatedly through concerned police station. However, compliance report received on the summon that both were not present in their place and has gone to out of district. (report attached herewith for ready reference please).

4. To verify summon compliance reports issued in different dates by the undersigned office, concerned DFC Jamshaid No. 655 of PC Lachi was summoned for appearance, recorded

mobile numbers but they showed their position out of District Faisalabad & Islamabad. ASI A. Ullah and IHC Sahfi Ullah were also made tracing of both accused but could not found / not showed interest in Inquiry proceedings. (summon attached herewith for ready reference please).

5. During the inquiry process, to determine facts and validity of the statement of the accused ASI Walibat was summoned again for cross examination, question answers which were placed in file after duly signed and attestation. He was given full opportunity to defend himself. (Cross examination attached herewith for ready reference please).

6. In order to dig out the facts the following witnesses were called and examined in presence of accused official, who was provided ample opportunity to monitor the witnesses (1) SHO Tahir Nawaz (2) Constable Lal Zada No.512 (3) DFC Jamshaid No. 655 (4) Constable Kashif Saeed No. 988 (5) Constable Mohammad Nazar No. 1376 (6) Constable Mohammad Qasim No. 702. (Statements attached herewith for ready reference please).

During the inquiry process accused official was cross examined (which is also attached herewith for ready reference please)

(CONCLUSION)

Keeping in view abovementioned facts and available record in hand, I came to the conclusion that though contraband / chars may be recovered from Mst: Parveen Bibi but involving Nazir s/o Laiq Zaman in criminal case u/s 34 PEHO seems dubious and illegal in nature. ASI/SHO instead of tracing the source of purchase of contraband / chars he charged and arrested on his ill-will Nazir s/o Laiq Zaman for his own personal gain. Involvement of SHO Tahir Nawaz in this activity cannot be ruled out. It is, therefore, suggested that he may be dealt with separate departmental proceedings. Accused involved in criminal case in abovementioned FIR may defend themselves in the court of law on merit without using this departmental inquiry.

Handwritten signature/initials

In the light of above, the undersigned is of the view that accused Walibat Khan ASI misused his authority for his personal gain and indulged himself in extra departmental activities and committed professional gross misconduct.

Therefore, accused official Walibat Khan ASI is recommended for major punishment under the ibid rules.

Submitted please.

DPO Kohat

(Enquiry Officer)
Superintendent of Police,
Operations Kohat 11/06/18.

①

BEFORE THE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 1032 /2018

Wali Bat Khan Liaqat Ali..... Appellant

Versus

Provincial Police Officer and others..... Respondents

REJOINDER ON BEHALF OF APPELLANT

Respectfully Sheweth;

Preliminary objection

That the reply/para-wise comment has not been competently filed and nor any affidavit has been filed in accordance with law nor the same has been properly attested, hence the same has no value in the eyes of law.

Rejoinder to Preliminary objection

Preliminary objection raised by respondents are erroneous, frivolous, based on male fide intention and having no factual and legal backing. Respondents have failed to explain as why the appellant has no cause of action when he has been awarded punishment and filing appeal is his substantive right and he has aggrieved party hence filed this appeal ; how the appeal is not maintainable in the present form; how the appellant has been estopped to filed the instant appeal; that what material fact has been concealed by the appellant from this Hon'ble Tribunal; who are the necessary parties to the appeal. No plausible explanation has been given by the respondents. No specific and due objection regarding the controversial question of facts and law involved in the instant service appeal has provided, therefore, appellant is unable to submit proper rejoinder to the preliminary objection raised by the respondents.

Rejoinder to Facts of Reply/ Parawise comments

1. Para No. 1 and 2 of the reply / parawise comments needs no reply. However it is submitted that respondent have not attached any such document which can be used against appellant to justify the allegation leveled against him. Furthermore whether it is not the duty of the respondent to prove allegation leveled against appellant.
2. In response to para No. 3 it is submitted that this paras is properly and comprehensively explained by appellant in his memo of appeal and no plausible explanation/ comments have been submitted to these para by the respondents. Further it is submitted that statement recorded by the enquiry officer clearly show that appellant has performed his duty in accordance to law.
3. Para No. 4 thee reply / parawise comments it is submitted that appellant being a Civil Servant has wrongly been proceeded with under the Police Rules 1975 nor adopted proper procedure. Further it submitted that proper procedure for disposal of appeal has not been adopted by respondent No. 2 envisages in the N.W.F.P Civil Servants (Appeal) Rules, 1986.

Rejoinder to the Grounds of Reply/ Parawise comments

- a) Para No. a- c of the reply / parawise comments are incorrect and that of memo of appeal are correct. Both the orders are illegal, unlawful, without authority, based on mala fide, void abinitio. The appellant has been proceeded with the rules and regulation which are not applicable to him nor proper procedure has been adopted by the respondents to determine the guilt of appellant. No evidence whatsoever has been procured against appellant. The statement recorded by the enquiry officer in absence of appellant also support the stance of appellant but, the same has been used against appellant with obvious reason that he has been made escape goat to please high ups as one of the accused is the co- villager of one of the responsible officer.

- b) Para No. d- h of the reply / parawise comments are incorrect hence denied. Detail given in the memo of appeal is correct the same has not been properly replied. Under the law in opportunity of cross examination of witnesses is the unalienable right of appellant but no opportunity of hearing has been provided to him, even then the statement recorded in his absence also support his stance but still the same has been used against him. (Copy of the statement is attached with memo of appeal). The penalty imposed on appellant is only on the basis of surmises and conjunctures without taking into consideration the documents and evidence provided by the appellant. The stance forwarded by the appellant has not been taken into consideration. Whether a person can be penalized only on here say evidence and whether this important aspect of the case has been considered by the respondent while awarding punishment to appellant. And whether it is justified under any canon of law that a good performance of a person has to be based for his punishment. No evidence whatsoever has been attached against the appellant with the Parawise Comments, which speaks about the veracity of the accusation.
- c) Para No. i- p of the reply / parawise comments are incorrect hence denied. No proper procedure of enquiry or awarding of punishment has been adopted by the respondent. The appellant being Civil Servant has wrongly been proceeded with. It is the ultimate purpose of law and rights guaranteed by the Constitution that no body has to be condemned unheard but here the basic right of the appellant has been violated and he has been condemned unheard, hence both the orders are liable to be set aside in the best interest. The Learned respondent No. 2 has not adopted proper procedure as mentioned in the N.W.F.P Civil Servants (Appeal) Rules, 1986. The question arises that whether there is any evidence regarding the allegation leveled against appellant and whether the punishment awarded to appellant being a civil servant is in accordance with law, rule and regulation. The procedure adopted by the respondents clearly show male fide intention, discrimination and undue victimization of the appellant and the appellant approaches this Hon'ble Tribunal being the final and highest forum of appeal. It is further submitted that rules and regulation

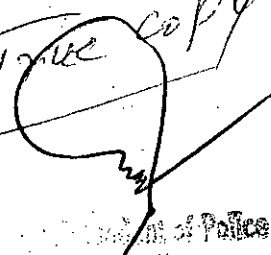
بیان اداں طالبہ نواز خان 540 سماج لاجی

فرم 13/5 کو میں سماج میں موجود تھا کہ بروز وقوعہ وی سی سی ASI
 نے مجھے کہا حال کیا اور کہا تم نام ندری پر اس عورت کو جس نے سماج
 کٹری ہے اور جس میں شاہان شہنی۔ تو فوراً نام ندری لاجی سماج لاجی
 اور مذکورہ عورت سے جو جو گئی کیا۔ تو عورت نے ندری نامی شخص کا نام
 بتلایا کہ ندری علیہ کا مکان ہے۔ میں اس میں ندری کر کے کر جاتی تھی
 میں نے وی سی سی ASI کو کہا کہ ان کے خلاف سہیل اور قانون کے مطابق
 کارروائی کرو۔ بقایا میں اس واقع سے لاعلم ہو۔ یہ میرا بیان ہے
 میں نے وہ بیان دیا وہ بالکل درست ہے۔

اللہ تبارک و تعالیٰ

29.5.018

True copy



Inspector of Police
 Registration
 Thana

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. ST8 /ST Dated 27-3- / 2019


To

The District Police Officer,
Government of Khyber Pakhtunkhwa,
Kohat.

Subject: - JUDGMENT IN APPEAL NO. 1032/2018, MR. WALI BAT.

I am directed to forward herewith a certified copy of Judgement dated 19.03.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

2. Brief facts of the case as per present service appeal are that the appellant was serving in Higher Education Department as Lab Assistant (BPS-7) in Government Degree College Lachi, Kohat. His salary was stopped since 01.02.2013 on the allegation of absence from duty. The appellant filed departmental appeal on 16.02.2015 but the same was not responded hence, the present service appeal on 20.05.2015.

3. At the very outset learned Additional Advocate General for the respondents contended that the appellant has filed the present service appeal for release of salary with effect from 01.02.2013 however, respondent-department has removed him from service vide order dated 10.09.2015 on the allegation of willful absence from duty therefore, the present service appeal regarding the release of salary become infructuous therefore, prayed for dismissal of appeal being infructuous.

4. On the other hand, learned counsel for the appellant opposed the contention of learned Additional Advocate General and prayed for acceptance of appeal.

5. Admittedly, the appellant has filed the present service appeal for release of his salary since 01.02.2013 on the ground that the respondent-department has stopped his salary on the allegation of absence from duty while the appellant was performing his duty regularly. During the pendency of the appellant, the respondent-department has removed the appellant from service with immediate effect due to willful absence from duty and the absence period with effect from 01.02.2013 was treated as unauthorized absence from duty without pay vide order dated 10.09.2015 therefore, in our opinion the present service appeal for release of salary become infructuous. As such, the present