

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No.16407/2020

Date of Institution ... 02.11.2020  
Date of Decision ... 12.09.2022

Adil Rehman No.887 of District Police Kohat.

... (Appellant)

**VERSUS**

Inspector General of Police Khyber Pakhtunkhwa, Peshawar and two others.

... (Respondents)

Syed Mudassir Pirzada,  
Advocate

... For appellant.

Naseer Ud Din Shah,  
Assistant Advocate General

... For respondents.

Rozina Rehman  
Fareeha Paul

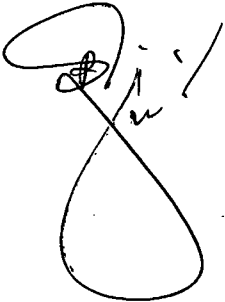
... Member (J)  
... Member (E)

**JUDGMENT**

**ROZINA REHMAN, MEMBER (J):** The appellant has invoked the jurisdiction of this Tribunal through above titled appeal with the prayer as copied below:

**“It is humbly prayed that the impugned order of DPO, Kohat dated 29.03.2016 may please be set aside for the end of justice and the appellant may please be graciously reinstated in service by ordering for denovo inquiry if necessary”.**

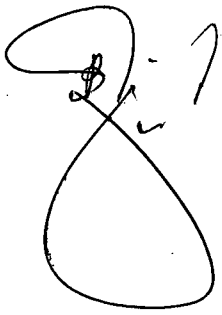
2. Brief facts of the case are that as per report of Moharrir PP Bannu Gate, case properties in shape of arms & ammunition etc. were found missing/deficient in the Mall Khana of the Police Post during the period of present appellant. In this regard, report was entered in the Roznamcha vide DD No.17 and 22. Upon the allegations, the appellant was



dismissed. A criminal case was also registered against the appellant and he was acquitted by the learned Trial Court, Kohat. He preferred a representation after a long legal battle but the same was rejected. During the rejection period, one of his close elders in District Hangu committed an offence U/S 302 PPC etc. and due to the said criminal case appellant also took refuge due to enmity in Northern Area for the sake of his life and was later on declared innocent and discharged from the so called allegations, hence, the present appeal.

3. We have heard Syed Mudassir Pirzada, Advocate learned counsel for the appellant and Naseer Ud Din Shah, learned Assistant Advocate General for respondents and have gone through the record and the proceedings of the case in minute particulars.


4. Syed Mudassir Pirzada Advocate, learned counsel for the appellant argued inter alia that the impugned orders are against law, facts and norms of justice as appellant was not treated according to law. Learned counsel contended that the appellant was behind the bars and all the proceedings were conducted in the absence of appellant which is apparent from the impugned order and that no proper departmental inquiry was conducted against the appellant. Further submitted that no opportunity of personal hearing was afforded to the appellant nor any witness was examined in his presence. Lastly, he submitted that as per law and judgment of the superior Courts when a criminal case is registered against a civil servant, then the proceedings of departmental inquiry has to be suspended till the decision of court but in the instant case, procedure was not adopted and inquiry report was not given to the



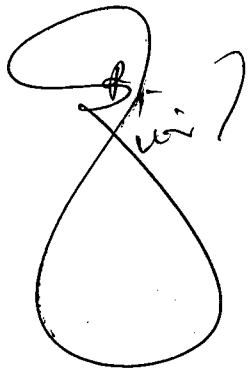
appellant which was very much necessary. He, therefore, requested for acceptance of this appeal.

5. Conversely, learned AAG submitted that departmental and criminal proceedings can run side by side hence, appellant was dismissed after proper departmental proceedings in accordance with law and rules. He submitted that as per report of Moharrir Police Post Bannu Gate, different articles, arms & ammunition in shape of case property were found missing in the Mal Khana, therefore, proper report was entered in the daily Roznamcha and appellant was served with charge sheet alongwith statement of allegations. DSP Saddar was appointed as Inquiry Officer who submitted his report wherein the appellant was found guilty of the charge. He was also served with final show cause notice whereafter he was called in Orderly Room but he could not appear, therefore, he was dismissed from service.

6. After hearing the learned counsel for the parties and going through the record of the case with their assistance and after perusing the precedent cases cited before us, we are of the opinion that the appellant while posted at PP Bannu Gate as Moharrir, was held responsible for missing/deficient case properties in the Mal Khana. In this regard, the then Moharrir Hameed Badshah also entered report in the Roznamcha vide DD No.17 dated 19.11.2014 and DD No.22 dated 25.12.2014. Charge sheet alongwith statement of allegations were issued but its service upon appellant is not available on file as admittedly, FIR No.272 was registered against appellant on 01.04.2016 U/S 406/409 PPC and he was arrested on the same date. The respondent Department failed to show



service of any notice inside the jail premises in the presence of Superintendent of Jail. Admittedly, no evidence was recorded by Inquiry Officer Sona Khan rather FIR was registered against the appellant on 01.04.2016, whereas charge sheet and statement of allegations were issued on 30.04.2015. The appellant was acquitted in the above mentioned case on 22.02.2017. It is worth mentioning that the date of the alleged occurrence was 19.11.2014, whereas FIR No.272 was registered on 01.04.2016 and the delay in lodging of FIR was never explained by the Department. Then after about 20 days another FIR No.326 was registered against the appellant and allegedly the occurrence had taken place on 02.04.2016. This delay in lodging of FIR was also not explained and vide judgment of the learned Senior Civil Judge, Kohat dated 25.11.2017, he was acquitted U/S 249 A Cr.PC. So far as missing of case properties in the Mal Khan during his tenure is concerned, nothing was brought in black & white to show that actually, he was the custodian of case property being Moharrir and that different items were found missing during his period. Register No.19 is kept for entering the detail of the case property but neither the register was produced before this Bench nor copy of the same was taken from the concerned Moharrir during the inquiry proceedings in order to show missing items in the Mal Khana during the tenure of appellant. An extract from the Roznamcha was produced before this Bench which shows that Hameed Badshah LHC who assumed charge from his predecessor Adil Rehman is available on file and who admitted the entries in the said register according to law where-after, both Hameed Badshah and Adil Rehman signed the relevant register which is available on file. One Sona Khan DSP Saddar had been




appointed as Inquiry Officer by DPO Kohat, whereas, the findings of the departmental inquiry clearly shows that the same was submitted by Sub Divisional Police Officer, Saddar Circle Kohat and order of the authority is missing as to how the inquiry was conducted by SDPO instead of DSP. Proper procedure was not adopted not only by the competent authority but also by the Inquiry Officer. Report of the inquiry Officer is silent in respect of missing items. The appellant was not given any opportunity of defense as well as personal hearing. No evidence was recorded and no opportunity of cross examination was given to the appellant. So far as limitation is concerned, major punishment of dismissal from service was awarded on 30.03.2016. He was acquitted on 22.02.2017 and just after acquittal, he filed appeal on 08.03.2017 which was rejected on 10.05.2017 by RPO Kohat Region. The appeal was quite well within time as he opted to file appeal after the decision by competent court of law and just after getting acquittal, he filed departmental appeal which was rejected. His revision petition was filed on 03.09.2020 which was rejected on 11.09.2020 and service appeal was filed on 21.10.2020. The revision was filed with a delay and the reason mentioned by the appellant is genuine as his close family elder in Thal District Hangu was allegedly involved in a criminal case U/S 302 324 PPC and the appellant being close relative of the accused party took refuge in the Northern Area due to enmity and after declaring the appellant innocent by the Jirga, he filed present service appeal, therefore, the delay in filing appeal is condoned.

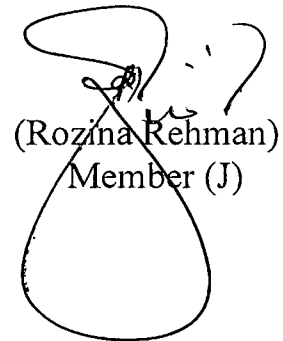
7. We are unison on acceptance of this appeal in the light of our observation in the preceding paras which immediately call for the

acceptance of the instant service appeal as prayed for. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.

12.09.2022

  
(Fajeeha Paul)  
Member (E)

  
(Rozina Rehman)  
Member (J)

**ORDER**

12.09.2022


Appellant present through counsel.

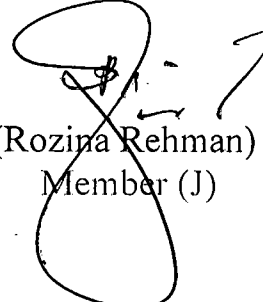
Naseer Ud Din Shah, learned Assistant Advocate General for respondents present. Arguments heard. Record perused.

Vide our detailed judgment of today of this Tribunal placed on file, instant service appeal is accepted as prayed for. Parties are left to bear their own costs. File be consigned to the record room.

**ANNOUNCED.**

12.09.2022


  
(Fareeha Paul)  
Member (E)

  
(Rozina Rehman)  
Member (J)

25.05.2022

Appellant in person present. Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Arif Saleem, Stenographer for the respondents present.

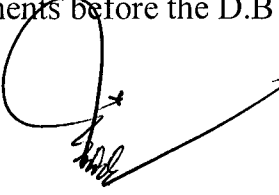
Representative of the respondents submitted written reply/comments which is placed on file. Copy of the same is handed over to the appellant. Adjourned. To come up for rejoinder if any, and arguments on 05.07.2022 before D.B.

  
(Mian Muhammad)  
Member (E)

05.07.2022

Learned counsel for the appellant present. Mr. Arif Saleem, Stenographer alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that he being busy in preparation of other cases, therefore, he was unable to make preparation for arguments. Adjourned. To come up for arguments before the D.B on 12.09.2022.

  
(MIAN MUHAMMAD)  
MEMBER (EXECUTIVE)

  
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)



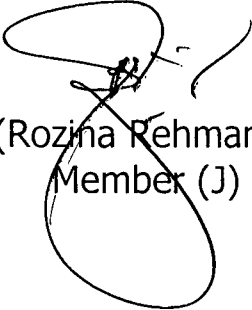
23.12.2021

Appellant present through counsel. Preliminary arguments heard and record perused.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices of the be issued to the respondents for submission of reply/comments. To come up for reply/comments on 09.03.2022 before S.B.

Appellant Deposited  
Security & Process Fee

23/12/21



(Rozina Rehman)  
Member (J)

09.03.2022

Due to retirement of the Hon'able Chairman, the case is adjourned to 25.05.2022 for the same as before.



Reader

27.05.2021

Appellant present in person and seeks adjournment as his learned counsel is indisposed today. Adjourned to 08.09.2021 for preliminary hearing before S.B.

  
Chairman

08.09.2021

Nemo for the appellant present.

Notice be issued to the appellant and his counsel. Adjourned. To come up for preliminary hearing before the S.B on 26.10.2021.

  
(MIAN MUHAMMAD)  
MEMBER (E)

26.10.2021

Clerk of counsel for the appellant present.

Seeks adjournment due to non-availability of learned counsel for the petitioner. Request is accorded. To come up for preliminary hearing on 23.12.2021 before S.B.




  
Chairman

Form- A

FORM OF ORDER SHEET

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

Case No.- 16407 /2020


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	22/12/2020	<p>The appeal of Mr. Adil Rehman resubmitted today by Syed Mudssir Pirzada Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08/02/21</u></p> <p> CHAIRMAN</p>
	08.02.2021	<p>Junior to counsel for appellant present.</p> <p>He made a request for adjournment as senior counsel is not available. Adjourned. To come up for preliminary hearing on 27.05.2021 before S.B.</p> <p> (Rozina Rehman) Member (J)</p>

The appeal of Mr. Adil Rehman no. 887 of District Police Kohat received today i.e. on 02.11.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ✓ 1- Memorandum of appeal may be got signed by the appellant.
- 2- The law under which appeal is filed is not mentioned.
- 3- Address of appellant is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal Rules 1974.
- 4- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.
- 5- Annexures of the appeal may be attested.
- 6- Annexures of the appeal may be flagged.
- 7- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 8- Five more copies/sets of the appeal along annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3784 /S.T,

Dt. 2/11 /2020.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Muddasir Pirzada Adv. Kohat.

Note

~~ATTESTED~~  
Re-submitted after removal all  
the objections, is

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal \_\_\_\_\_ 2020


Adil Rehman No: 887 of District police Kohat .....(Appellant)

**VERSUS**

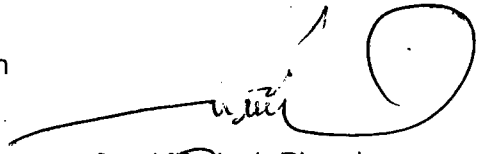
1. INSPECTOR GENERAL OF KPK POLICE PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT. (Respondent)

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Appellant

Through

  
Syed Mudasir Pirzada  
Advocate HC  
0345-9645854

Date 21 / 10 / 20

**ATTESTED**

①

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Adil Rehman No: 887 of District police Kohat 16407 (Appellant)

Khyber Pakhtunkhwa  
Service Tribunal

VERSUS

Diary No. 13839

1. INSPECTOR GENERAL OF KPK POLICE PESHAWAR.

Dated 2/11/2020

2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT

3. DISTRICT POLICE OFFICER KOHAT.

(Respondent)

*u/s 4 of KPK Services Tribunal Act, 1974*

APPEAL AGAINST THE IMPUGNED ORDER VIDE OB NO 289 DATED 29.03.2016 IN WHICH UPON THE ALLEGATION THE APPELLANT WAS DISMISSED AND WERE SEND TO JAIL AND AFTER ACQUITTAL APPELLANT PREFERRED DEPARTMENTAL REPRESENTATION WHICH WERE ALSO REJECTED.

Respectfully Sheweth,

With great veneration the instant appeal is preferred by the appellant on the following grounds:-

Facts:

Briefly facts of the case are that as per report of Mohariar PP Bannu Gate that when he assumed the charge of Mohariar on 21.10.2014 several case property articles/items/Arms and Ammunition were found missing/deficient in the maal Khana of the Police Post. In this regard he also registered his report in the roznamcha vide DD No: 17 dated 19.11.2014 DD No: 22 dated 25.12.2014.

1. That upon the allegation the service of the appellant were dismissed expertly without waiting for the decision of the court of law (Copy of impugned order is annexed as annexure A)

2. That criminal case was registered against the appellant vide FIR No: 272 U/s 406/409 PPC dated 01.04.2016 and appellant remained behind the bar and the appellant was Honorably acquitted by learned trial court Kohat dated 25-11-2017 (Copy of FIR along with order is annexed as annexure B)

3. That the appellant had preferred a representation after earning a long legal battle and earned acquittal from all the charges leveled against the appellant but the same was rejected on dated 10.05.2017. (Copy of all representation along with orders are annexed as annexure C)

4. That the appellant tender always a good service before the entire satisfaction of the superiors and never ever indulged in any subversive activity which are

Filed to-day  
Registrar  
2/11/2020

Resubmitted to-day  
and filed.  
Registrar  
2/11/2020

against to the norms of service rules" the allegation so recorded in impugned order are baseless having no legal footing and directly issued with the impugned order of major punishment and without keeping the good service record of the appellant.

5. That during rejection one of the close family elder in Thall District Hangu committed an offence u/Ss 302/324/15AA and due to the said criminal case the appellant took refuge due to enmity in Northern area for the sake of life and after the hectic efforts of the elder of the locality the appellant was declared innocent and discharge the appellant from so called allegation and now as juxta position preferred the service appeal on the following grounds inter alia.

### GROUNDS

- A. That the appellant was dealt departmentally strictly and service of the appellant was dismissed upon the enquiry finding report of the enquiry officer so appointed and no proper departmental enquiry ever been conducted.
- B. That appellant was behind the bar and all the proceeding were conducted in the absence of the appellant which is apparent from the impugned order .
- C. That there is a admitted fact mentioned in impugned order that the appellant submit the reply to the show cause notice and ex-part proceeding were conducted against the appellant one think does not appeal to a prudent mind that if a accused official submit reply to show cause notice then how the proceedings were considered ex-partly
- D. That no proper departmental enquiry have ever been conducted against the appellant and not provided opportunity of personal hearing nor provided opportunity of defense nor had tender opportunity of cross examination and without any lawful justification blessed with the impugned order.
- E. That as per the constitution fair trial and fair enquiry is the right of any employee and as per police rules when an employee earn acquittal from any criminal case so the department is bound to reinstate him in service.
- F. That in the light of the judgments of superior courts that when a criminal case has registered against an employee then no departmental proceedings were conducted and the proceedings of departmental enquiry be stopped/suspended till the decision of the court.
- G. That as mentioned above in leading Para that the appellant were faced enmity and after proving innocence before the complainant and the status of the petition does not include technicalities or hit the doctrine of latches and on the same footing the guide line of the superior courts in which it has been held that decision of the cases always been encourage on merit basis without indulging in technicalities including limitation as in other same junctures it were also held that no limitation time run against any order when the circumstances were beyond the control of human being.

3

H. That the appellant was neither provided an opportunity to cross examine the witnesses nor to produce defense evidence and the enquiry proceedings accordingly defective. Furthermore the requirements of rules regarding enquiry have not been observed while awarding the impugned punishment.

I That the appellant dragged unnecessarily into litigation which is clearly mentioned in **2008 SCMR 725**.

j:- That while awarding the impugned major punishment the enquiry report has not been given to the appellant which is very much necessary as per **1991 PLC CS 706 & PLC 1991 584**.

K That while rejecting the departmental representation the statement of complainant before the court regarding the allegation which were mentioned in the impugned order and the complainant himself admits that the appellant had properly handed over all the Government property along with case property while leaving the charge on dated 19.11.2014 vide DD No: 12 15;40hrs.

L That all the Departmental proceeding conducting against the appellant were not thoroughly probe and resultantly the material facts and crux and material available on record were not given due deliberation and the services of the appellant were dismissed which is against to the principle of natural justice.

M. That the appellant after acquittal from the court in a subject case the family of the appellant falsely charge in a criminal case under section 302 in case FIR No: 276 PS Thall (Hangu) and due to which there were extreme apprehension of Death the appellant remained absconder and after the satisfying the complainant party and then appellant appear before the worthy respondent No: 1 stating the fact that due to above circumstances the appellant was unable to prefer the departmental appeal but in vain and the request was not considered and only on the basis of limitation the appellant representation was rejected as the circumstances were beyond of the control of the appellant.

M- That the appellant is absolutely innocent and he has been punished for no fault on his part as well as all proceedings were conducted when appellant were behind the bar.

N- That the punishment being not in accordance with last and the principles of justice deserves to be set aside.

O- That if deemed proper, the appellant may kindly be heard in person.





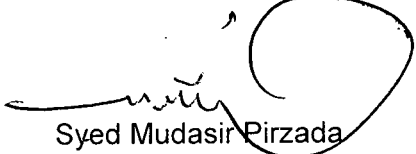
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In the view of above circumstances it is humbly prayed that the impugned order of DPO, Kohat date 29.03.2016 may please be set aside for the end of justice and the appellant may please be graciously reinstated in the service by ordering for denovo enquiry if necessary.

Appellant

Through

Date 21/10/20

  
Syed Mudasir Pirzada  
Advocate HC  
0345-9645854.

### Certificate:-

Certified that no such like appeal has earlier been filed in this Hon able Service tribunal as per instruction of my client.

### List of Books

- 1:- Constitution of Pakistan 1973
- 2:- Police Rules
- 3:- Case Law according to need.

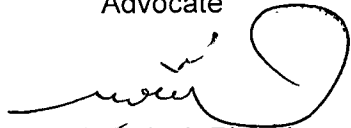
BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal \_\_\_\_\_ 2020

AFFIDAVIT

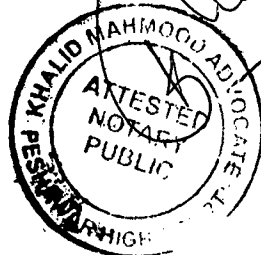
I, Syed Mudasir Pirzada Advocate, as per instruction of my client do here by solemnly affirm and declare that all the contents of accompanying service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

Advocate



Syed Mudasir Pirzada  
Advocate PHC  
0345-9645854

**KHALID MAHMOOD**  
Advocate  
Oath Commissioner  
Peshawar High Court



6

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Adil Rehman No: 887 of District police Kohat ..... (Appellant)

VERSUS

1. INSPECTOR GENERAL OF POLICE KPK PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT. (Respondent)


ADDRESS OF THE PARTIES

APPELLANT :-

Adil Rehman No: 887 of District police Kohat ,  
*S/o Khalid-ur-Rehman R/o Thall.*

RESPONDENTS

1. INSPECTOR GENERAL OF POLICE KPK PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT.

  
Appellant

Through



Syed Mudasir Pirzada  
Advocate PHC  
0345-9645854

Date \_\_\_\_/\_\_\_\_/\_\_\_\_

22/3  
5/1/14

7

Ammeex-A

31-3

POLICE DEPTT:

DISTRICT KOHAT

ORDER

This order is passed on the departmental enquiry against Constable Adil Rehman No. 877 of this District Police under the Khyber Pakhtunkhwa, Police Rules, 1975 Amendment 2014.

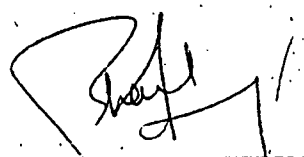
Brief facts are that as per report of Moharir PP Bannu Gate that when he assumed the charge of Moharir on 21.10.2014, several case property articles/Items/Arms and ammunitions were found missing/deficient in the Maal Khana of the Police Post. In this regard he also registered his report in the roznamcha vide DD No. 17 dated 19.11.2014, DD No. 22 dated 25.12.2014.

He was served with Charge Sheet & Statement of Allegations and DSP Saddar, Kohat was appointed as enquiry officer to proceed against him departmentally. Enquiry officer submitted his finding and stated that the defaulter police official was found guilty of the charge and have no defense. The defaulter police official miserably failed to submit any reply.

He was served with Final Show Cause Notice, reply to the Final Show Cause Notice was received and found un-satisfactory. He was called in O.R severally but he could not appear before the undersigned. Therefore, ex-parte action has been taken.

In view of above the undersigned I, Muhammad Sohaib Ashraf District Police Officer, Kohat in exercise of the powers conferred upon me, the defaulter police official is hereby awarded a major punishment of dismissal from service with immediate effect.

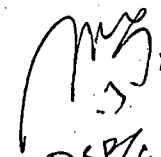
OB No. 289  
Date 29.3.2016

  
DISTRICT POLICE OFFICER,  
KOHAT 29/3

No. 4076-801 PA dated Kohat the 30-3-2016.  
Copy of above is forwarded for information and necessary action to, the:-

1. DSP City is directed to register a proper criminal case against the defaulter constable and arrest him accordingly;  
PO, SP and OHC for necessary action.
- 2.

**ATTESTED**

SHO/Cantt.  
for strict compliance.  
  
DSP/Cantt.  
31/3  
عزیز علی خان  
ڈپٹی سب ڈیو  
کوہاٹ  
2  
SHO/Cantt.  
1-4-16

**POLICE DEPTT:****DISTRICT KOHAT****ORDER**

This order is passed on the departmental enquiry against Constable Adil Rehman No 877 of this District Police under the Khyber Pakhtunkhwa, Police Rules, 1975 Amendment 2014.

Brief facts are that as per report of Moharir PP Bannu Gate that when he assumed the charge of Moharir on 21.10.2014, several case property articles / Items / Arms and ammunitions were found missing / deficient in the Maal Khana of the Police Post. In this regard he also registered his report in the roznamcha vide DD No 17 dated 19.11.2014, DD No. 22 dated 25.12.2014.

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**OB No. 289****Date 29.03.2016****DISTRICT POLICE OFFICER,  
KOHAT**

No. 4076.80/PA dated Kohat the 30.03.2016.

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

1. DSP City is directed to register a proper criminal case against the defaulter constable and arrest him accordingly;
2. PO, SRO and OHC for necessary action.

**ATTESTED**

-1-  
CHARGE SHEET.

8

1. I MUHAMMAD SOHAIB ASHRAF, DISTRICT POLICE OFFICER, KOHAT, as competent authority, hereby charge you Constable Adil Rehman No. 877 the then Moharir PP Bannu Gate Under Khyber Pakhtunkhwa, Police Rules, 1975 (Amendment 2014) as you have committed the following illegal act:

As per report of Moharir PP Bannu Gate that when he assumed the charge of Moharir on 21.10.2014, several case property articles/Items/Arms and ammunitions were found missing/deficient in the Maal Khana of the Police Post. In this regard he also registered his report in the roznamcha vide DD No. 17 dated 19.11.2014, DD No. 22 dated 25.12.2014. You were called by the undersigned in O.R and heard in person but you failed to reply satisfactory about the missing Arms and Ammunitions and other case property Items which indicated that you had all the Arms and ammunitions, charas and miscelinious case property articles/items, which is a gross misconduct on your part.

2. By reasons of the above, you appear to be guilty of misconduct as defined in Rule 2 (iii) of Police Disciplinary Rules, 1975 and have rendered yourself liable to all or any of the penalties explained in rule 04 of the said 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 defence to put in and in that case ex-parte action shall be taken against you.

4. A statement of allegation is enclosed.

*Received by*  
*Adil Rehman*  
*13/12/14*

**ATTESTED**

*[Signature]*  
**DISTRICT POLICE OFFICER,  
KOHAT**

**CHARGE SHEET**

1. **I MUHAMMAD SOAIB ASHRAF, DISTRICT POLICE OFFICER KOHAT**, as competent authority, hereby charge you **Constable Adil Rehman No 877 the then Moharir PP Bannu Gate** Under Khyber Pakhtunkhwa, Police Rules, 1975 (Amendment 2014) as you have committed the following illegal act.

As per report of Moharir PP Bannu Gate that when he assumed the charge of Moharir on 21.10.2014, several case property articles / items / Arms and ammunitions were found missing / deficient in the Maal Khana of the Police Post. In this regard he also registered his report in the roznamcha vide DD No 17 dated 19.11.2014, DD No 22 dated 25.12.2014. you were called by the undersigned in O.R and heard in person but you failed to reply satisfactory about the missing Arms and Ammunitions and other case property Items which indicated that you had all the Arms and Ammunitions, charas and miscellaneous case property articles / items, which is a gross mis conduct on your part.

2. By reasons of the above, you appear to be guilty of misconduct as defined in Rule 2 (iii) of the Police Disciplinary Rules, 1975 and have rendered yourself liable to all or any of the penalties explained in rule 04 of the said rules.

3. You are, therefore, required to submit your written statement within 07 days 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 defence to put in and in that case ex-parte action shall be taken against you.

4. A statement of allegation is enclosed.

**DISTRICT POLICE OFFICER  
KOHAT**

**ATTESTED**

2

(9)

**DISCIPLINARY ACTION**

1. I, **MUHAMMAD SOHAIB ASHRAF, DISTRICT POLICE OFFICER, KOHAT**, as competent authority, am of the opinion that you **Constable Adil Rehman No. 877 the then Moharir PP Bannu Gate** 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**

As per report of Moharir PP Bannu Gate that when he assumed the charge of Moharir on 21.10.2014, several case property articles/Items/Arms and ammunitions were found missing/deficient in the Maal Khana of the Police Post. In this regard he also registered his report in the roznamcha vide DD No. 17 dated 19.11.2014, DD No. 22 dated 25.12.2014. You were called by the undersigned in O.R and heard in person but you failed to reply satisfactory about the missing Arms and Ammunitions and other case property Items which indicated that you had all the Arms and ammunitions, charas and miscelinious case property articles/items, which is a gross mis conduct on your part.

2. For the purpose of scrutinizing the conduct of said accused with reference to the above allegations **Mr. Sona Khan DSP Saddar, Kohat** is appointed as enquiry officer. The enquiry officer shall in accordance with provision of the Police Disciplinary Rule-1975, provide reasonable opportunity of hearing to the accused official, record its 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.

**ATTESTED**

  
**DISTRICT POLICE OFFICER,  
KOHAT**

No. 4023-24/PA, dated 30-4-2015.

Copy of above is forwarded to:-

1. **Mr. Sona Khan DSP Saddar, Kohat**:- The Enquiry Officer for initiating proceedings against the accused under the provisions of Police Rule-1975.
2. **Constable Adil Rehman No. 877 the then Moharir PP Bannu Gate**:- The concerned official/ officer's with the directions to appear before the Enquiry officer, on the date, time and place fixed by the enquiry officer, for the purpose of enquiry proceedings.



**DISCIPLINARY ACTION**

1. **I MUHAMMAD SOAIB ASHRAF, DISTRICT POLICE OFFICER KOHAT**, as competent authority, am of the opinion that you **Constable Adil Rehman No 877 the then Moharir PP Bannu Gate** have rendered yourself liable to be proceeded against departmentally under Khyber Pakhtunkhwa, Police Rules, 1975 (Amendment 2014) as you have committed the following acts/omissions.

**STATEMENT OF ALLEGATIONS**

As per report of Moharir PP Bannu Gate that when he assumed the charge of Moharir on 21.10.2014, several case property articles / items / Arms and ammunitions were found missing / deficient in the Maal Khana of the Police Post. In this regard he also registered his report in the roznamcha vide DD No 17 dated 19.11.2014, DD No 22 dated 25.12.2014. you were called by the undersigned in O.R and heard in person but you failed to reply satisfactory about the missing Arms and Ammunitions and other case property Items which indicated that you had all the Arms and Ammunitions, charas and miscellaneous case property articles / items, which is a gross mis conduct on your part.

2. For the purpose of scrutinizing the conduct of said Accused with reference to the allegations **Mr. Sona Khan DSP Saddar, Kohat** is appointed as enquiry officer. The enquiry officer shall in accordance with provision of the Police Disciplinary Rule 1975, provide reasonable opportunity of hearing to the Accused official, record its 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.4023-24//PA, dated 30.04.2015.

Copy of above is forwarded to:-

1. Mr. Sona Khan DSP Saddar, Kohat:- The Enquiry Officer for initiating proceedings against teha cc under the provisions of Police Rule-1975.
2. Cnstable Adil Rehman No. 877 thee then Moharir PP Bannu Gate:- The concerned official /officer's with the direction to appear before the Enquiry officer, on the date, time and place fixed by the enquiry officer, for the purpose of enquiry proceedings.

**ATTESTED**

10

**FINAL SHOW CAUSE NOTICE**

1. I, Muhammad Sohaib Ashraf, District Police competent authority under the Khyber Pakhtunkhwa, Police Rule 2014 serve you Constable Adil Rehman No. 877 as follow:-

The consequent upon the completion of enquiries conducted by the Enquiry Officer, Mr. Sona Khan SDPO Saddar, Kohat.

2. On going through the findings and recommendations of Officer, the materials on the record and other connected papers, I am satisfied that the charge against you is proved and you have committed the following acts specified in Police Rule 1975 Amendment 2014.

As per report of Moharir PP Bannu Gate that when he assumed charge of Moharir on 21.10.2014, several case property articles/Items/ and ammunitions were found missing/deficient in the Maal Khana of the P. Post. In this regard he also registered his report in the roznamcha vide DD 17 dated 19.11.2014, DD No. 22 dated 25.12.2014. You were called by the undersigned in O.R and heard in person but you failed to reply satisfactorily about the missing Arms and Ammunitions and other case property Items which indicated that you had all the Arms and ammunitions, charas and miscellaneous case property articles/items, which is a gross misconduct on your part.

3. As a result thereof I, as competent authority, have tentatively decided to impose upon you the penalty of major punishment under Khyber Pakhtunkhwa, Police Rule 1975 Amendment 2014.

4. You are, therefore, required to Show Cause as to why the aforesaid penalty should not be imposed upon you, also intimate whether you desire to be heard in person.

5. If no reply to this notice is received within seven (7) days of its delivery in the normal course of circumstances, it will be considered/presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.

6. Copy of finding of the enquiry officer is enclosed.

No. 7291 /PA

Dated 18-6-2015

*in*  
**ATTESTED**

*Shafiq*  
**DISTRICT POLICE OFFICER,  
KOHAT**

**FINAL SHOW CASE NOTICE**

1. **I Muhammad Soaib Ashraf, District Police Officer Kohat**, as competent authority Under Khyber Pakhtunkhwa, Police Rules, 1975 (Amendment 2014) serve you **Constable Adil Rehman No 877** as follow:-

The consequent upon the completion of enquiries conducted against you by the Enquiry Officer, **Mr. Sona Khan SDPO Saddar, Kohat**.

2. On going through the findings and recommendations of the Enquiry Officer, the materials on the record and other connected papers, I am satisfied that the specified in Police Rule 1975 Amendment 2014.

As per report of Moharir PP Bannu Gate that when he assumed the charge of Moharir on 21.10.2014, several case property articles / items / Arms and ammunitions were found missing / deficient in the Maal Khana of the Police Post. In this regard he also registered his report in the roznamcha vide DD No 17 dated 19.11.2014, DD No 22 dated 25.12.2014. you were called by the undersigned in O.R and heard in person but you failed to reply satisfactory about the missing Arms and Ammunitions and other case property Items which indicated that you had all the Arms and Ammunitions, charas and miscellaneous case property articles / items, which is a gross mis conduct on your part.

3. As a result thereof I, as competent authority, have tentatively decided to compose upon you thee penalty of major punishment under Khyber Pakhtunkhwa, Police Rule 1975 Amendment 2014.

4. You are, therefore, required to Show Case as to why the aforesaid penalty should not be imposed upon you, also intimate whether you desire to be heard in person.

5. If no reply to this notice is received within seven (7) days of its delivery in the normal course of circumstances, it will be considered /presumed that you have no defence to put in and in the case an ex-parte action shall be taken against you.

6. Copy of finding of the enquiry officer is enclosed.

**No. 7291/PA**  
**Dated 186/2015**

**DISTRICT POLICE OFFICER**  
**KOHAT**

**ATTESTED**

Annex-B

انٹیکورجنل پولیس سروس سرنام نمبر ۷۳

# ابتدائی اطلاعی رپورٹ

(11)

کوئٹہ



قائیں) ابتدائی اطلاع نسبت مجرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ ۱۵۲ مجموعہ ضابطہ نو جوائن ۱۹۷۶ء  
 محتانہ و محتاملہ  
 منبج کوهانک . خانم  
 تاریخ و وقت وقوعہ معلوم  
 نمبر 272

1	تاریخ و وقت رپورٹ 19 1/4 وقت	18:20 بجے جاگرتگی پورہ 04 وقت 19:50
2	نام و سکونت اطلاع دہندہ و متغیث	محمد بادی شاہ قمر چوکی بنوں گڈ 14301-7498147-9
3	مختصر کیفیت مجرم (موردفعہ) حال اگر کچھ بیا گیا ہو	0333-9610905
4	جائے وقوعہ فاصلہ محتانہ سے اور سمیت	P. 406/409
5	نام و سکونت ملزم	بلدنگ چوکی بنوں گڈ
6	کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو۔	877 ولد خانق الرحمن سکنہ
7	محتانہ سے روانگی کی تاریخ و وقت	آرٹر حوصل حوٹے پورہ پورہ دیا جاتا ہے۔ یہ اسپیل ڈاک ہے۔

ابتدائی اطلاع نیچے درج کرو مستند سربراہ خان نمبر 2 نے بحال  
 عدالت 17، 19، 22، 25، 12، 14، چوکی بنوں گڈ کے سربراہان کو خبر کرائی کہ  
 افسران ملکہ صاحبان نے سربراہ خان نمبر 5 کے محتانہ زندگانی کرتے  
 سرنام 29، 3، 76، کو بحال 289، 289، 289، صاحب کوہانک نے ملزم  
 سربراہ خان نمبر 5 کو عدالت سے درخواست اور فوجیاری سے ملزم کو  
 کہنے کا حکم صادر فرمایا۔ آرٹرز کالی بوساقت، SDPO صاحب، SDO  
 صاحب گڈ حوصل سے کہہ کر ترقی یافتہ سربراہ خان نمبر 5 سے ملزم کو اطلاع دینا  
 رشتہ سے کہہ کر قتل کے الزام سے آرٹرز کالی، لقمہ دارت فد 17، 19، 22،  
 25، 12، چوکی بنوں گڈ لفظ کنیشن حوالہ NBI کا کیا جاتا ہے، 14، 3

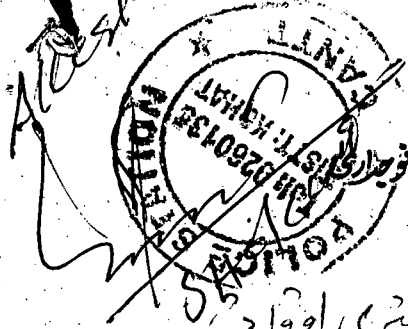
Acting Head  
 Ag. DP Best  
 01-04-2016

# ابتدائی اطلاع رپورٹ

(12)

کنٹر

نوم نمبر ۲۲



(فائیل) ابتدائی اطلاع نسبت مجرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ ۵۲ مجموعہ منابطہ قومی عدالت

منبع کوٹا

مقامہ گھاوٹی

تاریخ وقوع وقوعہ ۲۴/۴/۱۶ دھتری اوقات

نمبر 326

1	تاریخ وقوع رپورٹ ۲۴/۴/۱۶ وقت ۲۳:۵۵ بجے	تاریخ وقوع وقوعہ ۲۴/۴/۱۶ وقت ۱۳:۳۰ بجے
2	نام و سکونت اطلاع دہندہ و متیقنہ	ضمیم اللہ / HC / حال ریڈر / DP / صاحب کوٹا / 9602262-0333
3	مختصر کیفیت مجرم (موردفع) حال اگر کچھ بیا گیا ہو	506-504-25D
4	جائے وقوع و قومی فاصلہ مقامہ سے اور سمیت	دھتری / DP / صاحب کوٹا / 9530328-0333 14141-93698285
5	نام و سکونت مظنم	سابقہ / حوٹی بیوں / کنڈ / عادل الرحمن / 877 / ولد خان / رطلان / مکہ /
6	کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو۔	احقر ان / بالہ صاحبان سے مشاورت کے بعد DP دیا جاتا ہے
7	مقامہ سے روانگی کی تاریخ و وقت	بہ سبیل ڈاگ

**ابتدائی اطلاع نیچے درج کرو** منصف وکٹری خانہ مجرم کی رپورٹ کے ساتھ  
 ۱۶۵ صاحب نے بحوالہ حد ۳۱۳ روزنامہ ۲۴/۴/۱۶ منسٹری مجرم کے لئے جاری کیا کہ رپورٹ کی نسبت ان  
 بالہ صاحب نے سیکس کر کے بعد سیکس میں پھر ائم بالہ صاحب کے لئے فیکس جمع درخواست FIR  
 بخیر نصیب والا KBI سٹاف کی جانب سے ہے۔ یہم گزارش ہے فقہ ذیل ہے ~~۲۱/۴/۱۶~~ ۲۱/۴/۱۶  
 ۳۱/۴/۱۶ والی بصر صاحب گھان ۵۵۵ وقت ۲۴/۴/۱۶ وقت ۲۳:۵۵ بجے سے ہی دعوت سہارا میں رونہ جو الکر ۳۶ مالہ  
 ہے والی آیا۔ دوران گفت با صاحبان نے سیکس والا صاحب سیکس آرگنائزیشن کا سالانہ پروگرام  
 کیا۔ طلبہ صاحبان یہ ہم بخیر وجود تھا پروگرام شروع کیا۔ طلبہ صاحبان یہ ہم کو دعوت صاحب سوئی لبرہ  
 کھیر کے گادرات ہیں کہ کھیر کے گادرات موجود رہے نزد کھیر کے طلبہ اللہ ریڈر صاحب۔ DP صاحب واقع  
 ہو کر ایک درخواست کھیر کے سیکس کی درخواست ماضی ذیل ہے۔ کہ وقت تھا۔ ۵۵۵ صاحب گھانہ گھاوٹی  
 صاحب عالی۔ گزارش ہے کہ آج وقت ۲۴/۴/۱۶ کو اپنے دفتر DP آفس میں کارس کار میں موجود تھا کہ کھیر  
 کو راپیل خون ۹۶۰۲۲۶۲-۰۳۳۳ کو راپیل خون ۹۵۳۰۳۲۸-۰۳۳۳ سے کال کر نسبت کرنے پر عادل  
 الرحمن صاحب نے کھیر کے لئے کیا کیا ایک ریڈر (مردگرف) سٹاف نے حقے لٹری سے یہ حالت  
 کہا ہے اور یہ FIR کھیر کے درج ہوا ہے۔ یہ یہ واقع کہا ہے وہ وہ آپ کو کون میں خبر ان  
 کروں تھا اور بزرگ خون سٹاف نے سٹاف کی یہ کہاں اور ناز بنا الفاظ استعمال کے بلکہ حالت واقعات  
 تھا۔ DP صاحب کے ذہنی فیصلہ ہے۔ جو صاحب نے فیصلہ رپورٹ کیا وہی ہے وہ کھیر کے لئے یہ دعوت  
 فرمایا ہے۔ العارضہ دستخط انٹرنی ضمیم اللہ ریڈر DP صاحب کو تھا ۲۴/۴/۱۶ کارروائی میں گھانہ آفیس  
 کو حصہ ڈاگ صرف صرف درج بالہ کو کر سٹاف کنٹری عادل الرحمن کو کہ حکم سے یہ حالت ہو گیا ہے جس  
 کے خلاف فورم عدالت ۲۶۲ تاریخ ۱۶/۴/۱۶ کو گھانہ گھاوٹی درج رہا جو اپنے حذو کو ہے آج  
 عدالت سے BBA کرائی ہے۔ اندر سے بارہ درخواست فی نسبت ان بالہ صاحبان سے ڈی سیکس کی کیا  
 سرحدت سیکس کردہ درخواست درج روزنامہ لکھائی ہے صاحب عالی۔ نقل مطابق اہل ہے۔

انسپیکٹر جنرل پولیس صوبہ سرحد فارم نمبر ۷۳ گورنمنٹ پریس پشاور جاب نمبر 540/19 فارم سٹور۔ تعداد دو ہزار رجسٹرڈ۔ مورخہ 23 مارچ 2006 رپی فور (فارم سٹور جابز) ضمنی فارم (پولیس)

فارم نمبر ۲۳-۵-۱

## ابتدائی اطلاعی رپورٹ

کاؤنٹر فائیل

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زبردفعہ 154 مجموعہ ضابطہ فوجداری

ضلع: کوہاٹ

تھانہ:- چھاؤنی

تاریخ وقت وقوع: 2/4/16 دفتری اوقات

علت نمبر:- 326

1	تاریخ وقت رپورٹ:- 2/4/16 وقت 23:50 بجے	چاکیدگی پرچہ 2/4/16 وقت 13:00 بجے
2	نام و سکونت اطلاع دہندہ مستغیث	فہیم اللہ IHC حال ریڈر DPO صاحب کوہاٹ
3	مختصر کیفیت جرم (معد دفعہ) حال اگر کچھ لیا گیا ہو۔	PPC 506-504-25D
4	جائے وقوعہ فاصلہ تھانہ سے اور سمت:-	دفتر DPO صاحب کوہاٹ
5	نام و سکونت ملزم	سابقہ محرر چوکی بنوں گیٹ عادل الرحمان 877 ولد خالق رحمان سکنتل
6	کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو	افسران بالا صاحبان سے مشاورت کے بعد پرچہ دیا جاتا ہے
7	تھانہ سے روانگی کی تاریخ وقت	بہ سبیل ڈاک

ATTESTED

ابتدائی اطلاع نیچے درج کرو۔ مستغیث مندرجہ خانہ نمبر 2 کی رپورٹ سابقہ ایس ایچ او صاحب نے بحوالہ مد 34 روز نامچہ 2/4/16 ضبط تحریر میں لائی جا کر رپورٹ کی نسبت افسران بالا کیساتھ ڈسکس کر کے بعد ڈسکس پرچہ بگرام بالا چاک کر کے تقلمد معد درخواست FIR بغرض تفتیش حوالہ KBI سٹاف کی جاتی ہے پرچہ گزارش ہے تقلمد ذیل ہے۔ العبد 2/4/16۔ مد 34 واپسی عمر حیات خان SHO مورخہ 02/04/16 وقت 23:55 بجے میں معد ہمراہیاں رفتہ بحوالہ مد 26 بالا سے واپس آیا دوران گشت باچا خان لائبریری میں انصاف سٹوڈنٹس آرگنائزیشن کا سالانہ پروگرام تھا طاہر خان ASI کو ہدایت ہدایت منسابت بعدہ کچھری کے گاردات چیک کئے کچھری میں گاردات موجود پائے نزدیک کچھری فہیم اللہ ریڈر جناب ڈی پی او صاحب ملاتی ہو کر ایک درخواست تحریری پیش کی درخواست کا متن ذیل ہے بخدمت جناب ایس ایچ او صاحب تھانہ چھاؤنی جناب عالی گزارش ہے کہ آج مورخہ 2/4/16 کو اپنے دفتر DPO آفس میں کارسکار میں مصروف تھا کہ میرے موبائل فون نمبر 0333-9602262 پر موبائل فون نمبر 0333-9530328 سے کال آ کر آئینڈ کرنے پر عادل الرحمان سابقہ پولیس کنسٹیبل تھا جنہوں نے مجھے کہا کہ آپ ریڈر دیگر دفتری سٹاف نے مجھے نوکری سے برخاست کیا ہے اور میرے خلاف FIR بھی درج رجسٹر کیا ہے میرے پانچ بھائی ہیں وہ میں آپ لوگوں پر قربان کرونگا اور بذر یو فون سنگین نتائج کی دھمکیاں اور نازیبا الفاظ استعمال کئے جملہ حالات، واقعاتی جناب DPO صاحب کے نوٹس میں لائے گئے جو جناب نے مفصل رپورٹ تھانہ چھاؤنی میں درج کرنے کی ہدایت فرمائی ہے العارض دستخط انگریزی فہیم اللہ ریڈر DPO صاحب کوہاٹ 2/4/16 کارروائی پولیس تھانہ آمدہ پیش کردہ درخواست حرف، بحرف درج بالا ہو کر سابقہ کنسٹیبل عادل الرحمان جو کہ محکمہ سے برخاست ہو چکا ہے جس کے خلاف مقدمہ علت 272 مورخہ 1/4/16 جرم PPC 406/409 تھانہ چھاؤنی درج رجسٹر ہوا ہے مذکورہ نے آج عدالت سے BBA کرائی ہے اندر میں بارہ درخواست کی نسبت افسران بالا صاحبان سے ڈسکس کی جائیگی سریدست پیش کردہ درج روز نامچہ کی جاتی ہے جناب عالی نقول بمطابق اصل ہے۔

دستخط انگریزی 21-4-16

تاریخ وقت وقوع ۱۶/۶/۱۸۱۳ء

تاریخ وقت پورٹ

۱۶/۶/۱۸۱۳ء وقت کراچی ۱۸۱۳ء جاکیدگی ۱۶/۶/۱۸۱۳ء وقت ۱۹:۰۵ بجے

مذکورہ اطلاع دہندہ و منیفٹ

عمر فاروق ولد میر ملک خان سکندر احمدی شہر انجمن لوئر

مذکورہ جرم (مردوم) حال اگر کچھ یا گیا ہو

PPC 302/324-4

ہائے وقوعہ فاصلہ تھانہ سے اور ہیئت

قوی مارکٹ سین بازار اٹل

۱۱) حاجی محمد شہیر علی (3) خان زمان پسران لوئر ساکنان

مذکورہ موقع کے متعلق کی گئی اگر اطلاع درج

۱۲) محمد شہیر علی (3) خان زمان پسران لوئر ساکنان

پر میں توقف ہوا ہو تو وجہ بیان کرو۔

نمبر سپرینٹنڈنٹ اسلٹہ پیر صیہ دیا جائے

خانہ سے روایتی کی تاریخ و وقت

ایضالی اطلاع پورٹ

ایضالی اطلاع نیچے درج کرو اور اس وقت ایک قسم کی حد اسلام قوانین  
جمشید خان ۱۸۱۳ء سے بدست کئی سال قبل ۸۳۶ موصل ہو کر بدست ذیل سے آئے  
انچارج تھانہ ایسٹرن سون سیکشن میں مسی عمر فاروق وار میر ملک خان  
احمدی جمعہ کرم ایضالی لوئر موائل نمبر 301-302-303-304-305-306-307-308-309-310-311-312-313-314-315-316-317-318-319-320-321-322-323-324-325-326-327-328-329-330-331-332-333-334-335-336-337-338-339-340-341-342-343-344-345-346-347-348-349-350-351-352-353-354-355-356-357-358-359-360-361-362-363-364-365-366-367-368-369-370-371-372-373-374-375-376-377-378-379-380-381-382-383-384-385-386-387-388-389-390-391-392-393-394-395-396-397-398-399-400-401-402-403-404-405-406-407-408-409-410-411-412-413-414-415-416-417-418-419-420-421-422-423-424-425-426-427-428-429-430-431-432-433-434-435-436-437-438-439-440-441-442-443-444-445-446-447-448-449-450-451-452-453-454-455-456-457-458-459-460-461-462-463-464-465-466-467-468-469-470-471-472-473-474-475-476-477-478-479-480-481-482-483-484-485-486-487-488-489-490-491-492-493-494-495-496-497-498-499-500-501-502-503-504-505-506-507-508-509-510-511-512-513-514-515-516-517-518-519-520-521-522-523-524-525-526-527-528-529-530-531-532-533-534-535-536-537-538-539-540-541-542-543-544-545-546-547-548-549-550-551-552-553-554-555-556-557-558-559-560-561-562-563-564-565-566-567-568-569-570-571-572-573-574-575-576-577-578-579-580-581-582-583-584-585-586-587-588-589-590-591-592-593-594-595-596-597-598-599-600-601-602-603-604-605-606-607-608-609-610-611-612-613-614-615-616-617-618-619-620-621-622-623-624-625-626-627-628-629-630-631-632-633-634-635-636-637-638-639-640-641-642-643-644-645-646-647-648-649-650-651-652-653-654-655-656-657-658-659-660-661-662-663-664-665-666-667-668-669-670-671-672-673-674-675-676-677-678-679-680-681-682-683-684-685-686-687-688-689-690-691-692-693-694-695-696-697-698-699-700-701-702-703-704-705-706-707-708-709-710-711-712-713-714-715-716-717-718-719-720-721-722-723-724-725-726-727-728-729-730-731-732-733-734-735-736-737-738-739-740-741-742-743-744-745-746-747-748-749-750-751-752-753-754-755-756-757-758-759-760-761-762-763-764-765-766-767-768-769-770-771-772-773-774-775-776-777-778-779-780-781-782-783-784-785-786-787-788-789-790-791-792-793-794-795-796-797-798-799-800-801-802-803-804-805-806-807-808-809-810-811-812-813-814-815-816-817-818-819-820-821-822-823-824-825-826-827-828-829-830-831-832-833-834-835-836-837-838-839-840-841-842-843-844-845-846-847-848-849-850-851-852-853-854-855-856-857-858-859-860-861-862-863-864-865-866-867-868-869-870-871-872-873-874-875-876-877-878-879-880-881-882-883-884-885-886-887-888-889-890-891-892-893-894-895-896-897-898-899-900-901-902-903-904-905-906-907-908-909-910-911-912-913-914-915-916-917-918-919-920-921-922-923-924-925-926-927-928-929-930-931-932-933-934-935-936-937-938-939-940-941-942-943-944-945-946-947-948-949-950-951-952-953-954-955-956-957-958-959-960-961-962-963-964-965-966-967-968-969-970-971-972-973-974-975-976-977-978-979-980-981-982-983-984-985-986-987-988-989-990-991-992-993-994-995-996-997-998-999-1000

ATTESTED

بیت مالای مالکی و شیخو انگریزی

حسب گفتہ مسائل اور ریش صحت جبراً درج بنا اور  
 صحابہ گیارہ دست نام کئے زیر پور پور خود شیخو نصیب کی  
 جنابید انصاری گروہوں مضمون اور ریش سے صورت جبراً مال  
 تاکہ وقتوں تک تعمیر خان کے کاغذات و دیگر صورت  
 کے جبکہ بدوچ طفل عباس کا نقشہ مندر صرف کر کے  
 برخطانہ کنسیل جن علی 836 حوالہ ڈاکٹر صاحب کالج  
 واسطہ بحیرانم مارہ صرف کر کے بدین کنسیل مشفق  
 کی بیجوایا جانے بعد اندراج مقدمہ بطور امینٹل آرڈر  
 صرف کنسیل حوالہ BH اسٹاف کیا جاوے و شیخو  
 انگریزی محمد رفیقان ASH مورخ 7/7 کا شہادت نام کارروائی  
 خانہ آمدہ فراسد صرف بحرف درج مال سوکر مورخ  
 بحرم امینٹل آرڈر جان سوکر نقل 18 فروری 1917  
 کارروائی صرف و مقبولی بعد من کنسیل حوالہ  
 BH اسٹاف کارروائی 1917

11/17 حالہ کل کل سے نقل کر کے مندرجہ ڈاکٹور ہول پور سے مای کورٹ  
 رقم 14 بجے 5 خطبات آرڈر منٹ حوالہ BH اسٹاف کو سف خان 1917 کیا گیا

کارروائی کل من

اصول 11/17 20/17 اسٹاف میں من  
 184 چالان تکو کور سول جج جیم نلسن پور  
 نائب کورٹ طاہر بیٹ زنگہ من دست خطوار حوالہ کل

11/17-11-17  
 11/17-11-17

ATTESTED



رپورٹ بالا کی تائید کی دستخط انگریزی کے sic حسب گفتہ سائل رپورٹ حرف بحرف درج  
بالا ہو کر پڑھ کر سنایا سمجھایا گیا درست تسلیم کر کے زیر رپورٹ خود دستخط مثبت کی جسکی میں تصدیق  
کرتا ہوں مضمون رپورٹ سے صورت جرم بالا پائی جا کر مقتول ملک نصیر خان کے کاغذات  
مرگ مرتب کر کے جبکہ مجروح طفل عباس کا نقشہ ضرر مرتب کر کے برحفاظت کنسٹیبل حسن علی  
836 حوالہ ڈاکٹر صاحب کی گئی مراسلہ جرائم بالا مرتب کر کے بدست کنسٹیبل مشتاق بھجوا یا جاتا  
ہے بعد اندراج مقدمہ بطور سپیشل رپورٹ بغرض تفتیش حوالہ IBH سٹاف کیا جاوے دستخط  
انگریزی جمشید خان ASHO مورخہ 16/6/17 تھانہ ٹل کارروائی تھانہ آمدہ مراسلہ حرف  
بحرف درج بالا ہو کر پرچہ مجرم اسپیشل رپورٹ چاک ہو کر نقل FIR معہ مراسلہ کارڈ گرفتاری، فرد  
مقبوضگی بغرض تفتیش حوالہ IBH سٹاف کیا جاتا ہے پرچہ گزارش ہے۔

21/11/17 چالان مکمل ہے نقل مثل پولیس بذریعہ ڈاگ موصول ہو کر بمعہ ہائی کورٹ  
sic بمعہ 5 قطعات آرڈر شیٹ حوالہ IBH سٹاف یوسف خان ASI کیا گیا۔

محرر مکمل خان 21/11/17

امروز 22/11/17 کو بذریعہ رسید 361/21 بدست من ASI چالان مکمل محرر رسول جج  
جبکہ نقل مثل پولیس نائب کورٹ طاہر بٹ ان کورٹ دست طور پر حوالہ کی گئی۔


ATTESTED

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O-22

30.10.2017

Accused present on bail. PWs Absent, be summoned through SD for 25.11.2017.

  
Raja Muhammad Shoaib Khan  
Senior Civil Judge/Judicial  
Magistrate/Sec-30, Kohat

**IN THE COURT OF RAJA MUHAMMAD SHOAB KHAN**  
**SENIOR CIVIL JUDGE/JUDICIAL MAGISTRATE/SECTION-30**  
**KOHAT.**

Order-23

25.11.2017

APP for State present. Accused alongwith counsel present. Complainant also present. PW Abid Khan and Malak Jan Investigation Officer despite information failed to appear before the court. The Court vide order dated 17.07.2017 has already issued notice to the prosecution u/s 249-A CrPC as last chance to procure the evidence of the prosecution but despite that the prosecution failed to comply the court order thus I am incline to decide the case as per available record.

**ATTESTED**

Brief fact of the case are such that complainant Faheem Ullah reported the matter to the SHO, PS Cantt that on 02.04.2016 he was present in the DPO office in relation to his official business when he received a call from mobile No. 03339530328 on his mobile No. 03339602262. On attending the call it was Adil-ur-Rehman ex-police constable who threaten the complainant with dire consequences and told him that he alongwith his five brothers will sacrifice their lives as complainant was involved for his dismissal. The police

*continue*

Order-22 contd:

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on the same day chalked FIR against the accused Adil Ur Rehman u/s 506/504 PPC and 25-D Telegraph Act on 21.04.2017. The accused was arrested on 20.04.2016.

Complete challan was put in court on 11.06.2016. After appearance of the accused, formal charge was framed against him on 26.07.2016. Prosecution was invited to produce evidence in the case. In compliance complainant himself appeared as PW-2 while Muhrrar of the concerned police station appeared as PW -1. The other two police officials despite several opportunities and information failed to appear before the court. Consequently notice issued u/s 249-A on 27.07.2017.

I heard learned counsel for the accused and APP for State as well as complainant in person.

Keeping in view the submission at the bar and from perusal of record,

**ATTESTED**

the court observed the following points: -

1. In the application the complainant failed to mention any time of the occurrence. However as per CDR the police mentioned time for occurrence as 07.40 hours on 04.02.2016. Admittedly, the name of the receiver of the call is Muhammad Ayaz and not owned by the complainant himself.
2. Secondly, on the alleged date of occurrence it was Saturday when the all the public office including DPO office was closed. Even otherwise it was not usual office hours. Further FIR was registered on 21.04.2017. The delay was not explained by the prosecution.

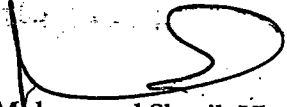
*auth*

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3. Thirdly, there is no witness of the occurrence and no time is mentioned in the FIR.

In view of the above the court comes to the conclusion that despite several opportunities the prosecution failed to produce complete evidence in the case. The evidence recorded before the court as PW-1 & PW-2 is not sufficient to prove the charges against the accused. The accused is facing inconvenience since the registration of the FIR with the hands of police officials which amounts to miscarriage of justice. Hence the accused is hereby acquitted u/s 249-A Cr.PC. Sureties are discharge from their liabilities regarding bail bonds. Case file be consigned to the record room after its completion and compilation.

**ANNOUNCED:**  
25.11.2017

  
Raja Muhammad Shoaib Khan  
Senior Civil Judge/Judicial  
Magistrate/Sec-30, Kohat

(18)

Amex-C

Amianu  
P-14

BEFORE THE DEPUTY INSPECTOR GENERAL POLICE KOHAT  
REGION, KOHAT

SUBJECT: APPEAL AGAINST THE ORDER OF DPO KOHAT ISSUED  
VIDE OB NO.289 DATED 29-03-2016 WHEREBY THE  
APPELLANT EX-CONSTABLE ADIL REHMAN NO.877  
OF KOHAT DISTT:POLICE WAS DISMISSED FROM  
SERVICE WITH IMMEDIATE EFFECT.

Respectfully Shewith,

With humble submission, the appellant prefers the instant appeal based on the following facts and grounds.

FACTS:-

Brief facts are that LHC Hameed Bad Shah reported that on assuming the charge of Malkhana of PP Bannu gate from the appellant on 21-10-2014, several items of govt/case property was found missing in the malkhana and in this regard he had entered the reports vide DD No.17 dated 19-11-2014 of PP Bannu gate. On the above allegation, the appellant was dealt with departmentally and through ex-party action n by DPO Kohat, the appellant was dismissed from service vide the impugned order. ( Copy of the order is enclosed).

GROUND:-

- A. Reason advanced by the enquiry officer for ex-party proceeding was that the appellant had failed to appear before him despite being summoned several times. However it was not so as no summon /perwana was served upon the appellant during the course of enquiry proceedings. In such circumstances, it was required of the enquiry officer to have summoned the appellant through daily news paper by way of a notice and should not have carried out ex-party proceedings.
- B. That the witnesses were examined by the E.O in the absence of the appellant depriving him of his right of cross examination which fact had caused prejudice to the appellant in his defence.
- C. That major punishment had been awarded to the appellant without observation of the rule of "Natural Justice".
- D. That following the departmental enquiry, a case vide FIR No:272 dated 1-4-2016 PS Cantt: Kohat u/s 406/409 PPC was registered against the appellant which ended in the acquittal of the appellant vide judgement passed by learned Additional Sessions judge – III, Kohat on 22-2-2017. ( Attested copy of the order is enclosed).

PRAYER:-

In view of the above submissions, it is prayed that the appellant may kindly be re-instated in service w.e.f from the date of his dismissal please.

Dated 08-03-2017

**ATTESTED**

Yours Obediently

Ex-Constable Adil Rehman No.877  
S/O Khaliq Rehman  
R/O Mohallah Hamzani, Thall, PS Thall  
District Hangu.

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BEFORE THE INSPECTOR GENERAL OF POLICE KHYBER PAKHTUNKHWA  
PESHAWAR.

SUBJECT: APPEAL/REVIEW 11-A AGAINST THE IMPUGNED ORDER OF DPO KOHAT  
VIDE OB NO 289 DATED 29.03.2016 IN WHICH UPON THE ILLIGATION THE  
APPELLANT WAS DISMISSED AND APPELLANT PREFERRED DEPARTMENTAL  
REPRESENTATION WHICH WAS DEPARTMENTAL REPRESENTATION DTAED  
05.08.2016 FROM DISTRICT KOHAT JAIL WHICH AS REJECTED ON  
11.05.2017

Respectfully Sheweth,

With great veneration the instant appeal is preferred by the appellant on the following grounds:-

Facts:

Briefly facts of the case are that as per report of Mohariar PP Bannu Gate that when he assumed the charge of Mohariar on 21.10.2014 several case property articles/items/Arms and Ammunition were found missing/deficient in the maal Khana of the Police Post. In this regard he also registered his report in the roznamcha vide DD.No: 17 dated 19.11.2014 DD No: 22 dated 25.12.2014.

1. That a criminal case was registered against the appellant vide FIR No: 272 under Ss 406/409 Ppc dated 01.04.2016 and appellant remained behind the bar and the appellant was Honorably acquit learned trial court Addl Session Judge III Kohat dated 22.02.2017.
2. That the appellant had preferred a representation after earning a long legal battle and earned acquittal from all the charges leveled against the appellant but the same was rejected on dated 10.05.2017.
3. That the appellant tender always a good service before the entire satisfaction of the superiors and never ever indulged in any subversive activity which are against to the norms of service rules" the allegation so recorded in impugned order are baseless having no legal footing and directly issued with the impugned order of major punishment and without keeping the good service record of the appellant.
4. That during rejection one of the close family elder in Thall District Hangu committed an offence u/Ss 302/324/15AA and due to the said criminal case the appellant took refuge due to enmity in Northern area for the sake of life and after the hectic efforts of the elder of the locality the appellant was declared innocent and discharge the appellant from so called allegation and now as juxta positio, preferred the instant review petition on the following grounds inter alia.

ATTESTED

GROUNDS

- A. That the appellant was dealt departmentally strictly and service of the appellant was dismissed upon the enquiry finding report of the enquiry officer so appointed and no proper departmental enquiry ever been conducted.
- B. That appellant was behind the bar and all the proceeding were conducted in the absence of the appellant which is apparent from the impugned order (Copy of the impugned order is annexed A.
- C. That there is a admitted fact mentioned in impugned order that the appellant submit the reply to the show cause notice and ex-part proceeding were conducted against the appellant one think does not appeal to a prudent mind that if a accused official submit reply to show cause notice then how the proceedings were considered ex-partly
- D. That no proper departmental enquiry have ever been conducted against the appellant and not provided opportunity of personal hearing nor provided opportunity of defense nor had tender opportunity of cross examination and without any lawful justification blessed with the impugned order.
- E. That as per the constitution fair trial and fair enquiry is the right of any employee and as per police rules when an employee earn acquittal from any criminal case so the department is bound to reinstate him in service.
- F. That in the light of the judgments of superior courts that when a criminal case has registered against an employee then no departmental proceedings were conducted and the proceedings of departmental enquiry be stopped/suspended till the decision of the court.
- G. That as mentioned above in leading Para that the appellant were faced enmity and after proving innocence before the complainant and the status of the petition does not include technicalities or hit the doctrine of latches and on the same footing the guide line of the superior courts in which it has been held that decision of the cases always been encourage on merit basis without indulging in technicalities including limitation as in other same junctures it were also held that no limitation time run against any order when the circumstances were beyond the control of human being.
- H. That the appellant was neither provided an opportunity to cross examine the witnesses nor to produce defense evidence and the enquiry proceedings accordingly defective. Furthermore the requirements of rules regarding enquiry have not been observed while awarding the impugned punishment.
- I. That the appellant dragged unnecessarily into litigation which is clearly mentioned in 2008 SCMR 725.

ATTESTED

j.-That while awarding the impugned major punishment the enquiry report has

(21)

not been given to the appellant which is very much necessary as per 1991 PLC CS 706 & PLC 1991 584.

H That while rejecting the departmental representation the statement of complainant before the court regarding the allegation which were mentioned in the impugned order and the complainant himself admits that the appellant had properly handed over all the Government property alongwith case property while living the charge on dated 19.11.2014 vide DD No: 12 15;40hrs.

i. That all the Departmental proceeding conducting against the appellant were not thoroughly probe and resultantly the material facts and crux and material available on record were not given due deliberation and the services of the appellant were dismissed which is against to the principle of natural justice.

j- That the appellant is absolutely innocent and he has been punished for no fault on his part.

k- That the punishment being not in accordance with last and the principles of justice deserves to be set aside.

l- That if deemed proper, the appellant may kindly be heard in person.

Pray:

In the view of above circumstances it is humbly prayed that the impugned order of DPO, Kohat date 29.03.2016 may please be set aside for the end of justice and the appellant may please be graciously reinstated in the service by ordering for denovo enquiry.

Date: 03/09/2020

*Adil Rehman* 03/09/2020  
(Appellant)

Adil Rehman S/o Khaliq Rehman  
Ex-Const: of Kohat Police No.877  
0333-9012179  
14101-9309828-5

ATTESTED



F. 584 — 16/17  
(22)

ORDER.

This order will dispose of a departmental appeal, moved by Ex-Constable Adil Rehman No. 877 of Kohat district Police against the punishment order passed by DPO Kohat vide OB No. 289, dated 29.03.2016, whereby he was awarded major punishment of dismissal from service for the allegations of swindling in official Arms / Ammunitions and other articles.

He preferred appeal to 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 10.05.2017.

I have gone through the available record and came to the conclusion that the allegations leveled against the appellant are proved and the punishment order passed by DPO Kohat is correct. Hence, his appeal being devoid of merits is hereby rejected.

Order Announced  
10.05.2017

*Awal Khan*

(AWAL KHAN)  
Regional Police Officer,  
Kohat Region.

No. 4084 / EC, dated Kohat the 11/05 / 2017.

Copy to the District Police Officer, Kohat for information w/r to his office Memo: No. 7177/LB, dated 13.04.2017. His service record is enclosed herewith.

*Awal Khan*

(AWAL KHAN)  
Regional Police Officer,  
Kohat Region.

Encls  
S/Roll = (2)  
P/Dismissal = (2)

~~\_\_\_\_\_~~  
ATTESTED

*AR*  
*11/05/2017*

*21*



23

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office, Peshawar.

No. S/ 3579 /20, dated Peshawar the 11/09 /2020.

To: The Regional Police Officer,  
Kohat Region Kohat

Subject: - REVISION PETITION.

Memo:

The Competent Authority has examined and filed the revision petition submitted by Ex-Constable Adil Rehman No. 877 of District Police Kohat against the punishment of dismissal from Service awarded by DPO Kohat vide OB No. 289, dated 29.03.2016, being badly time barred.

The applicant may please be informed accordingly.

7061  
21-9-20

EX-  
21/9

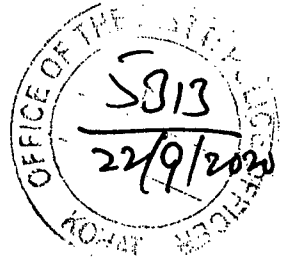
11/9/20  
22/9/20  
DPO Kohat

(SYED ANIS-UL-HASSAN)  
Registrar,  
For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar

To inform him accordingly  
please.

OAG (P) Kohat  
23/9/20

DIG POLICE  
KOHAT  
21/9



District Police Officer,  
Kohat  
22/9/2020

ATTESTED

Service Appeal \_\_\_\_\_ 2020

Adil Rehman No: 887 of District police Kohat ..... (Appellant)

**VERSUS**

1. INSPECTOR GENERAL OF KPK POLICE PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT. (Respondent)

**APPLICATION FOR CONDONATION OF DELAY DUE**

1:-That the appellant representation was pending before respondent No-2.

2:-That the representation was pending and the appellant due to criminal case of Family elders remains absconder and after Jirga of elder of locality the appellant proved himself innocent then able to approach the honourable fourms for the redressal of grievance.(Copy of FIR already annexed)

3:- That all the prevailing circumstances were beyond the control of the appellant.

4:- That no lawyer were available to draft the appeal before the honourable tribunal .

6:- That these circumstance were beyond the control of human being and were natural hence appellant were deprived form Justice .

8:- That it is there fore humbly prayed that the delay if any may please be condone for the end of justice.

9: That due to strike of lawyers no one available to draft the appeal.  
Appellant

Through

Syed Mudasir Pirzada (Advocate)

0345-9645854.

25

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

Service Appeal No. \_\_\_\_\_/2020

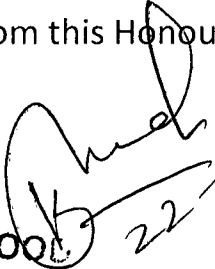
Adil Rehman No.887 of District Police Kohat. ....(Appellant)

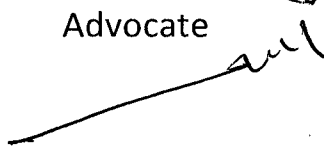
**VERSUS**

Inspector General of Police, Peshawar & others. .... (Respondents)

**AFFIDAVIT**

I, Syed Mudasir Pirzada Advocate as per instruction of my client, do hereby solemnly affirm and declare on oath that all the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

  
KHALID MAHMOOD  
Advocate  
Oath Commissioner  
Peshawar High Court

Advocate  
  
Syed Mudasir Pirzada  
Advocate PHC  
00345-9645854



26



382

ایڈوکیٹ دستخط:

بار کونسل ابار ایسوسی ایشن نمبر: 6c-09-1969

رابطہ نمبر: 0345-9645854

کوہاٹ بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: خدیجہ کھٹو کٹواہ سرو سن کرسٹینل کٹواہ

دعویٰ نمبر: SA No. /	منجانب: APPellant
علت نمبر	
مورخہ	عادل رحمن بنام
تھانہ	گورنمنٹ کورٹ

## باعت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام کٹواہ کیلئے کرسٹینل کٹواہ اٹورنری اور کٹواہ کونسل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقر 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 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ 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 وہ وکیل موصوف وصول کرنے کا حقدار 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۔

المرقوم 24/10/20

الغواہ شد

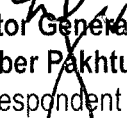
Saidam

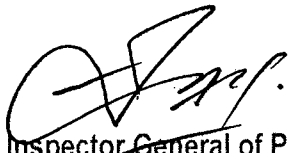
- L. Incorrect. The appellant was treated in accordance with law/ rules no discrimination has been done to the appellant by the answering respondents.
- M. Incorrect. The Revision Petition was rejected being time barred vide Letter No. S/3594/20, dated 11.09.2020. (Copy annexed as "C").
- N. Incorrect. As already explained above.
- O. Incorrect. As already explained above.
- P. The respondents may also be allowed to raise additional Grounds at the time of hearing of the instant service appeal.

**PRAYER:-**

Keeping in view the above stated facts and rules it is therefore humbly prayed that the appeal is not maintainable being devoid of merits hence, may kindly be dismissed with costs, please.

  
District Police Officer,  
Kohat  
(Respondent No. 3)

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

  
Dy: Inspector General of Police,  
Kohat Region Kohat  
(Respondent No. 2)  
**DIG POLICE  
KOHAT**

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

**Service Appeal No. 16407/ 2020**  
**Adil Rehman**  
Ex-Const: No. 877 District Kohat

..... Appellant

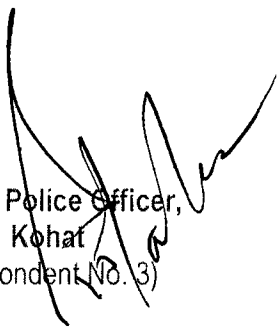
**VERSUS**

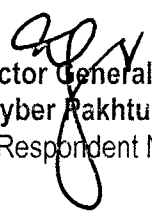
Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar

..... Respondent

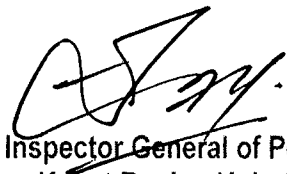
**COUNTER AFFIDAVIT**

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.

  
District Police Officer,  
Kohat  
(Respondent No. 3)

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



  
Dy: Inspector General of Police,  
Kohat Region Kohat  
(Respondent No. 2)  
**DIG POLICE  
KOHAT**

**POLICE DEPTT:**

**DISTRICT KOHAT**

**ORDER**

This order is passed on the departmental enquiry against Constable Adil Rehman No. 877 of this District Police under the Khyber Pakhtunkhwa, Police Rules, 1975 Amendment 2014.

Brief facts are that as per report of Moharir PP Bannu Gate that when he assumed the charge of Moharir on 21.10.2014, several case property articles/Items/Arms and ammunitions were found missing/deficient in the Maal Khana of the Police Post. In this regard he also registered his report in the roznamcha vide DD No. 17 dated 19.11.2014, DD No. 22 dated 25.12.2014.

He was served with Charge Sheet & Statement of Allegations and DSP Saddar, Kohat was appointed as enquiry officer to proceed against him departmentally. Enquiry officer submitted his finding and stated that the defaulter police official was found guilty of the charge and have no defense. The defaulter police official miserably failed to submit any reply.

He was served with Final Show Cause Notice, reply to the Final Show Cause Notice was received and found un-satisfactory. He was called in O.R severally but he could not appear before the undersigned. Therefore, ex-parte action has been taken.

In view of above the undersigned I, Muhammad Sohaib Ashraf District Police Officer, Kohat in exercise of the powers conferred upon me, the defaulter police official is hereby awarded a major punishment of dismissal from service with immediate effect.

OB No. 289  
Date 29-3-2016

  
**DISTRICT POLICE OFFICER,  
KOHAT** 29/3

No. 4076-80 PA dated Kohat the 30-3-2016.

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

1. DSP City is directed to register a proper criminal case against the defaulter constable and arrest him accordingly.
2. PO, SRC and OHC for necessary action.

Handwritten notes in Urdu script, including the word 'وہابی' (Wahabi).



**ORDER.**

This order will dispose of a departmental appeal, moved by Ex-Constable Adil Rehman No. 877 of Kohat district Police against the punishment order passed by DPO Kohat vide OB No. 289, dated 29.03.2016, whereby he was awarded major punishment of dismissal from service for the allegations of swindling in official Arms / Ammunitions and other articles.

He preferred appeal to 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 10.05.2017.

I have gone through the available record and came to the conclusion that the allegations leveled against the appellant are proved and the punishment order passed by DPO Kohat is correct. Hence, his appeal being devoid of merits is hereby **rejected**.

**Order Announced**  
10.05.2017

*Awal Khan*

(AWAL KHAN)  
Regional Police Officer,  
Kohat Region.

No. 4084 / EC, dated Kohat the 11/05 /2017.

Copy to the District Police Officer, Kohat for information w/r to his office Memo: No. 7177/LB, dated 13.04.2017. His service record is enclosed herewith.

*Awal Khan*

(AWAL KHAN)  
Regional Police Officer,  
Kohat Region.



OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office, Peshawar.

No. S/ 3574 /20, dated Peshawar the 11/09 /2020.

To: The Regional Police Officer,  
Kohat Region Kohat

Subject: - REVISION PETITION.

Memo:

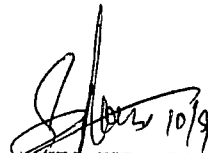
The Competent Authority has examined and filed the revision petition submitted by Ex-Constable Adil Rehman No. 877 of District Police Kohat against the punishment of dismissal from Service awarded by DPO Kohat vide OB No. 289, dated 29.03.2016, being badly time barred.

The applicant may please be informed accordingly.

7061  
21-9-20

PK  
21/9

11/9/20  
22/9/20  
DPO Kohat

  
(SYED ANIS-UL-HASSAN)  
Registrar,  
For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar

To inform him accordingly  
please.

OHC (P) 4  
22/9/20  
District Police Officer,  
Kohat.  
22/9/20

  
DIG POLICE  
KOHAT  
21/9

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KOHAT  
5813  
22/9/2020

21/9

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

---

Service Appeal No. 16407/ 2020

**Adil Rehman**

Ex-Const: No. 877 District Kohat

..... Appellant

**VERSUS**

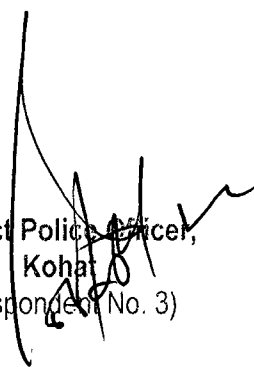
Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar

..... Respondent

**AUTHORITY LETTER**

Mr. Arif Saleem steno / Focal person of this district is hereby authorized to file the comments on behalf of respondent in the Honorable Tribunal and other documents as required.

District Police Officer,  
Kohat  
(Respondent No. 3)



**BEFORE THE HONOABLE KPK SERVICE TRIBUNAL PESHAWAR.**

Service Appeal No: 16407/2020

Ex-Constable No: Adil Rehman 877/ Kohat Range \_\_\_\_\_ Appellant.

Versus

The Inspector General of Police  
KPK Peshawar and others

\_\_\_\_\_ Respondent.

**Rejoinder for and on behalf of appellant to the comments, filed by respondents**

Respected Sheweth,

**Rejoinder to the comments of respondent are as under.**

**Reply to Preliminary Objection :-**

1:- That Para No-1&2 in preliminary Objection is incorrect because the appellant has good cause of action and balance of convenience is also in favor of present appellant and the appeal with in time as no limitation run against void order..

3:-That Para No-3 is incorrect appellant has been removed from service feeling aggrieved hence competent authority tribunal has jurisdiction to entertain service appeal as per law and proper law is made for it.

4:-That Para No-4 is incorrect ,the appellant has properly file departmentally appeal to the respondent above but in vain having no other alternate remedy except the instant appeal and respondent department deliberately not considering the innocence of the appellant as the appellant has already been acquitted form all the charges.

5:- That the Para No-5 is incorrect, the appellant feeling aggrieved from the impugned order having no alternate remedy hence approach to the honorable tribunal with clean hand.

6- That Para No:6 is incorrect, the appellant has file the department representation which was not entertain hence approach to this tribunal for the redressal of his grievance with in time as per report of officials of respondents

7;- That Para No:7 is incorrect, the appellant has file the department representation which was not entertain hence approach to this tribunal for the redressal of his grievance with in time as per report of officials respondents ,but one thing does not appeal to prudent mind that what element compel to issued impugned order keeping in view that in past same type of appellant has been consider the representation without indulging in technicalities including limitation .

**Facts Reply:-**

1:-Facts Para No- 1,of the facts is legal and pertains to record as there is no fair enquiry as per rule hence need no further comments.

2:-Facts Para No-2 of the facts is incorrect and pertains to record but it is pertinent to mention here that appellant was in jail the exparte party proceedings were conducted against the appellant provided that the respondent department should wait for decision of the court and as per rule appellant was entitle for reinstatement as per police rules .

3:-Facts Para No- 3 of the facts is incorrect no one is above the law the appellant was acquitted honorable from the court of law which speaks that the appellant was innocent but still the respondent department does not consider the innocent of the appellant .

4: -Facts Para No- 4 of the facts is totally incorrect when enquiry has not been carried out against the rules then how the appellant was consider guilty .

5:- Facts Para No- 5 of the facts is legal but the respondent has no valid grounds hence to avoid the wastage of precious time tribunal not allow the respondent to agitate more grounds .

**Reply to grounds of comments :-**

A:- That the Para No-A of the grounds is incorrect no proper enquiry was conducted according to rules which would explain at time of arguments .

B:- That Para No- b not explain by respondent which shows that respondent department has nothing to adduce any legal fact.

C:- That Para No- C of the grounds of comments of respondents is incorrect as already explain in Para C of the service appeal which needs no further reply.

D:- That Para No- D is of the grounds is incorrect and strange on which will be discuss at the time of arguments hence need no reply further contended that appellatant was in jail for long time then how appellatant be able to appear before any proceedings of departmental .

E:- That Para No- E is incorrect nothing available on record which proof the stance of the respondent and even ignored the acquittal order .

F:- That Para No- F of the grounds of comments is incorrect appellatant is acquitted form all the charges levelled against him and appellatant was in jail provided that the respondent should wait for the decision of the court.

G:- That Para No- G of the grounds of comments is self explanatory .

H:- That Para No-H is incorrect no proper enquiry has ever been conducted till to date which show the bias ness on the part of respondent .

I:- That Para I, of reply is already mentioned in para leading para's hence needs no comments.

J:- That Para J is incorrect no single piece of evidence is available on record which Connect the appellatant with guilt also acquit from the charges.

K:- That Para K is incorrect appellatant perform his duty according to law and properly hand over all items before departure but the appellatant condemn un heard on his back and ex-party proceeding were conducted against the appellatant which is against to the canon of justice as well as principal of natural justice .

L:- That Para L is incorrect the appellatant no speaking order is passed which is self explanatory form the impugned order..

M: That Para M is incorrect the appellatant is acquitted from all the charges .

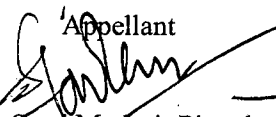
N:- That Para N is incorrect the respondent have no right to allowed to for futher arguments on the basis the respondent have no defense .

O: That the respondent department has nothing to produce any further valid grounds hence they did not explain the rest of Paras.

**Prayer:-**

On acceptance of this rejoinder the appeal may kindly graciously be accepted and appellatant may please be reinstated in service with all back benefits and the instance of the appellatant is with in time after releasing from jail on the basis of acquittal and it is also prayed that any other remedy as deemed proper by the honorable tribunal respectively may award please.

Through

Appellant  
  
Syed Mudasir Pirzada  
Advocate District Courts  
Kohat

Dt:- 5-7-22

FINDING OF DEPARTMENTAL ENQUIRY AGAINST CONSTABLE ADIL REHMAN NO. 877  
THE THEN MOHARRIR PP BANNU GATE OF PS CANTT

Respected Sir,

It is submitted that the undersigned was designed as enquiry officer to conduct enquiry into the matter as well as on the allegation mentioned against Constable Adil Rehman No. 877 the then Moharir of PP Bannu Gate of PS Cantt: presently posted at PS Gumbat district police Kohat for conducting departmental enquiry / proceedings as the above named accused officer is committed the following illegal act

“As per report of Moharrir PP Bannu Gate that when he assumed the charge of Moharir on 21.10.2014, several case property articles / Items / Arms and ammunitions were found missing / deficient in the Mall Khana of the Police Post. In this regard he also registered his report in the roznamcha vide DD No.17 dated 19.11.2014, DD No.22 dated 25.12.2014. you were called by the undersigned in O.R and heard in person but you failed to reply satisfactory about the missing Arms and Ammunitions and other case property items which indicated that your had all the Arms and Ammunitions, charas and miscellaneous case property articles / items which is a gross misconduct on your part

Fact given to arise that the being accused police official while posted at PP Bannu Gate as Moharrir that when he assumed the charge of Moharir on 21.10.2014, several case property articles / Items / Arms and ammunitions were found missing / deficient in the Mall Khana of the Police Post Bannu Gate. In this regard the then Moharrir Hameed Badshah also entered a report in the roznamcha vide DD No.17 dated 19.11.201 PP Bannu Gate and DD No.22 dated 25.12.2014. The defaulter police official was called by the then District Police Officer in O.R and heard in person but the defaulter police official was badly failed to narrate his reply as satisfactory about the missing Arms and Ammunitions and other case property items. This act of the defaulter police official was indicated that the defaulter police official had all the Arms and Ammunitions, Charas and miscellaneous case property articles / items. This shows his irresponsibility and lake of interest in official duty.

On 04.05.2015, the enquiry papers / file against the defaulter police officer were received to the office of the undersigned vide your good office Endst: No.4023-24 / PA, dated 30.04.2015. The defaulter police official was informed through PS Gumbat for deliver upon the charge sheet and summary of allegation on him. On 13.05.2015 the charge sheet and summary of allegation was delivered upon him.

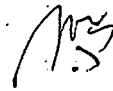
Beside of this the defaulter police official was directed time to time through police station Gumbat to submit his written reply but no lice is crawling / creeping on his ears. In this regard, on 10.06.2015 an Urdu perwana has been issued through by SHO of PS Gumbat but in-vain. The second letter vides No. 784 / S dated 15.06.2015 has also been issued but nothing done. The defaulter police officer miserably failed to submit any reply of the charge sheet and the statement of the allegation.

On the perusal of the above circumstances, the defaulter Police Officer was found guilty of charge and have no defense. The defaulter police official miserably failed to submit any reply. This shows his negligence and unwarranted as well as non professionalisms.

**FINDING**


Keeping in the view of above circumstances, the defaulter police officer is found guilty of charge and has no defense. The charge level against him, could also be substantiated, please

Submitted, please

  
Sub: Divisional Police Officer  
Saddar Circle, Kohat

No. 795 / S, dated 17/06/2015

Copy of above along with relevant papers, is submitted to the District Police Officer, Kohat for favour of perusal and further order w/r to his office Endst: No. 4023-24 / PA, dated 30.04.2015, pleas

  
Sub: Divisional Police Officer  
Saddar Circle, Kohat

IN THE COURT OF IHSANULLAH KHAN MAHSUD,  
ADDITIONAL SESSIONS JUDGE-III, KOHAT.

Sessions Case No 72 of 2016

Date of Institution.....23.06.2016

Date of Decision.....22.02.2017

The State

VERSUS

ADIL REHMAN S/O KHALIQ REHMAN R/O THALL

(Accused facing trial)

CHARGED UNDER SECTION 406/409 OF THE PPC VIDE  
CASE FIR NO-272, DATED-01.04.2016 OF POLICE STATION-  
CANTT, KOHAT.

J U D G M E N T :

1. The prosecution's case as per the FIR is that on 19.11.2014 the complainant, Hameed Badshah who was posted as Moharrir in PP Bannu Gate a few days prior, reported vide Mad # 17 of DD dated 19.11.2014 that he had taken over charge as Moharrir of the PP from his predecessor in office namely Adil Rehman # 877 and that on examining registers # 16 & 19 it came to light that the case properties in so many cases, details whereof he recorded in the DD were missing; the missing articles as per his report consisted of house hold articles, arms & ammunition, currency and a bullet proof jacket. On 25.12.2014 the complainant once again recorded Mad # 22 whereby he again reported that he had demanded of his predecessor in office Adil Rehman Ex-Moharrir of the PP to make good the deficiencies unearthed by him but that till that time he could not make the missing articles available.

2. Following the reports of the complainant Hameed Badshah Moharrir referred to above, a departmental inquiry was ordered and

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initiated against accused facing trial Adil Rehman which culminated in office order dated 29.03.2016 of the District Police Officer, Kohat whereby the accused facing trial was awarded major penalty in the shape of dismissal from service; the learned DPO also ordered registration of a criminal case against him hence, the FIR.

3. After completion of investigation the case was challaned to the court for trial whereupon the accused facing trial was summoned who was produced in custody. Copies of the documents against him were supplied to him under Section-265-C of the Cr.P.C and he was formally charged under Sections-406 read with Section 409 of the PPC, to which he pleaded not guilty and claimed trial. The prosecution was then directed to produce its evidence in the course whereof the prosecution in support of its case produced as many as 04 witnesses including.

Asif Hayat, ASI as PW-1, who stated that:

"On receipt of order of DPO, Kohat I chalked out the FIR Ex:PA against the accused facing trial."

Umar Hayat, DSP appeared as PW-2, who stated that:

"I submitted interim challan as well as complete challan against the accused facing trial in this case"

Malak Jan, SI as PW-3, who stated that:

"After registration of FIR, copy of FIR, Order of DPO and Naqal Mud No.17 & 22 were received by me for investigation. I prepared site plan Ex:PB and checked registers No.16 & 19. After rejection of BBA petition I arrested accused Adil Rehman vide card of arrest Ex:PW-3/1. I recorded the statement of PW's. I produced the accused before the court for five days custody vide application Ex:PW-3/2; one day custody was granted. On 23.04.2016 I produced the accused on judicial remand vide application Ex:PW-3/3, recorded statement of accused u/s 161 Cr.P.C. After completion of investigation I submitted the case file to SHO for submission of challan."

Hameed Badshah, LHC as PW-4, who stated that:

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*Nad*  
EXAMINE  
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"During the days of occurrence I was posted as Moharrir PP Bannu Gate, PS Cantt. Kohat. When I was posted as Moharrir of PP Bannu Gate. In the meanwhile so many days elapsed but the accused facing trial was reluctant to relinquish his charge. Thereafter he prepared the lists of the case properties for handing over the charge to me. After inspection of Registers No.19 & 18 there was missing of so many case properties. Thereafter I made entry in the daily diary No.17 dated 19.11.2014 Ex.PW.4/1 and Mad No.22 dated 25.12.2014 Ex.PW.4/2. I-times and again orally requested accused Adil Rehman to submit the missing case property. I also showed him the Mad reports regarding missing of the case properties. In the meanwhile an inquiry was initiated through DSP City Lal Farid Khan. In the meanwhile I was transferred and before relinquishment of my charge accused Adil Rehman produced one bullet proof jacket alongwith 500 rounds of 7.62 bore. In this respect I also made entries in the D.D. No.10 dated 20.1.2016 Ex.PW.4/3."

17912  
4. After the prosecution's evidence was closed, the statement of accused was recorded under Section-342 Cr.P.C, whereby he denied the prosecution's allegations and professed innocence. The accused however, neither wished to produce DWs nor opted to have his statement recorded on oath as required under Section-340 (2) Cr.P.C.

5. Arguments were heard and record gone through.

6. Learned APP for the State argued that prosecution has been able to substantiate its case on the strength of convincing evidence and no material contradictions were brought forth on record. He added that the accused facing trial was directly charged by the complainant for having misappropriated case properties, cash amount and arms & ammunition which were entrusted to him in his official capacity and that there is sufficient evidence on record in light of which the case against the accused facing trial stands proved.

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COURT OF SESSIONS KOKHAT

27/2/17

7. To the contrary the thrust of written arguments submitted by the defense is that the accused facing trial has been falsely implicated in the instant case and that the testimonies of the PWs before this Court fall short of connecting the accused facing trial with the commission of the offence for which he is charged; that there exist certain glaring contradictions in prosecution's evidence going to the root of the case and thereby casting serious shadows of doubt on the whole case of the prosecution.

8. After having heard the arguments, I examined the record of the case from which it transpires that the complainant had reported the loss of the articles which are subject matter of this case on 19.11.2014 but FIR regarding the occurrence was registered on 01.04.2016 i.e. after delay of about one year and four months. Be that as it may, but since the charge against the accused facing trial was that he had misappropriated the case property i.e. the arms ammunitions and other articles including currency etc it would follow that the prosecution was bound to prove in the first place that the articles which were allegedly misappropriated by the accused facing trial were actually there in the Malkhana of the police post at the time of his posting as Muharrir and further that it was in his tenure that these articles went missing but it appears there has been no effort on part of the prosecution to first establish this fact. Moreover, it being a case of theft from the Malkhana of a Police Post, the investigation agency was duty bound to carry out detailed and deep investigation in a scientific manner to get to the root of the case but ironically when the case is looked into minutely, it transpires that it has been investigated in a very slipshod and unprofessional manner leaving many holes in the case of the prosecution.

9. Hameed Badsrah, LHC who is complainant in this case and the star prosecution witness appeared in the witness box as PW-04 and he repeated his narrative as recorded by him in DD # 17 dated 19.11.2014 and

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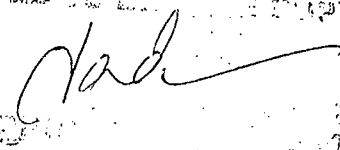
Mad # 22 dated 25.12.2014 which are available on record as Ex:PW-4/1 and Ex:PW-4/2. In his cross-examination however, he was confronted with DD # 12 dated 19.11.2014 where it is recorded that he took over charge of the government/case property correctly from the accused facing trial which would suggest that the articles were available in the Malkhana when he took over charge of the Malkhana as its custodian. This despite the fact that the loss was reported initially on 19.11.2014 and during the time before the registration of the FIR a full fledged departmental inquiry was also held to look into the matter and the District Police took more than a year to finalize the inquiry.

10. The next important prosecution witness is Malak Jan, SI who investigated the case and later on appeared in the witness box as PW-03 and he has admitted during his cross-examination that he did not take registers # 16 & 19 of PP Bannu Gate in possession during investigation and that neither had he placed the relevant extracts of the said registers on the case file. He also admitted that the accused facing trial did not make any confession before him.

11. Since it is an unseen occurrence with no direct ocular evidence against the accused facing trial, the prosecution was required to produce strong circumstantial evidence in support of its case in order to bring home guilt to the accused but there is no cogent circumstantial evidence on record worth the name to prove his guilt beyond doubt. What is more, the accused facing trial after his arrest remained in police custody and despite having been thoroughly interrogated he neither confessed his guilt nor was any incriminating recovery effected from him or at his pointation.

12. This being so, it becomes clear that except for the mere charge of the complainant leveled against the accused facing trial vide his DD, there is no cogent and reliable evidence on record against the accused

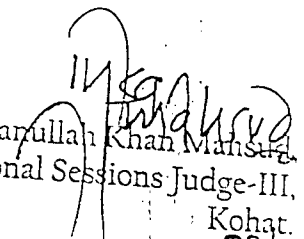
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facing trial to bring home guilt to him without a shadow of doubt. Therefore, this Court acquits the accused facing trial of the charge leveled against him by giving him the benefit of doubt. Accused Adil Rehman is in custody hence, he be released forthwith if not required in any other case.

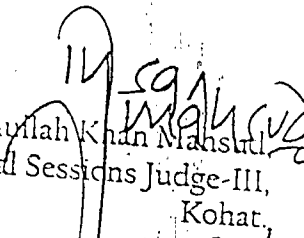
13. The case property if any be disposed of in accordance with law Record be transmitted back while case file of this Court be consigned to the record room after its completion and compilation.

ANNOUNCED  
22.02.2017

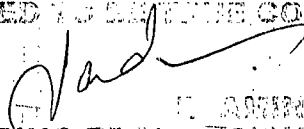
  
Ihsanullah Khan Mansuri  
Additional Sessions Judge-III,  
Kohat.  
22/2/17.

CERTIFICATE.

Certified that this judgment consists of (06) pages. Each page has been read over, corrected where ever necessary and signed by me.

  
Ihsanullah Khan Mansuri  
Additional Sessions Judge-III,  
Kohat.  
22/2/17.

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I AM SIGNED  
COPIES OF THIS JUDGMENT  
27/2/17.

9 والی حلالی 19<sup>11</sup>/<sub>14</sub> موزخ 13:00 بجے اس وقت لنگر خانہ میں جو کچھ ہوا۔ بالخصوص وہاں کے عہدہ داروں کے ساتھ ساتھ۔

10 والی حلالی 19<sup>11</sup>/<sub>14</sub> موزخ 13:10 بجے اس وقت لنگر خانہ میں جو کچھ ہوا۔ بالخصوص وہاں کے عہدہ داروں کے ساتھ ساتھ۔

11 والی حلالی 19<sup>11</sup>/<sub>14</sub> موزخ 13:30 بجے میں وہاں جو کچھ ہوا۔ بالخصوص وہاں کے عہدہ داروں کے ساتھ ساتھ۔

12 والی حلالی 19<sup>11</sup>/<sub>14</sub> موزخ 15:40 بجے میں وہاں جو کچھ ہوا۔ بالخصوص وہاں کے عہدہ داروں کے ساتھ ساتھ۔

والی حلالی 19<sup>11</sup>/<sub>14</sub> موزخ 15:40 بجے میں وہاں جو کچھ ہوا۔ بالخصوص وہاں کے عہدہ داروں کے ساتھ ساتھ۔

والی حلالی 19<sup>11</sup>/<sub>14</sub> موزخ 15:40 بجے میں وہاں جو کچھ ہوا۔ بالخصوص وہاں کے عہدہ داروں کے ساتھ ساتھ۔

13 والی حلالی 19<sup>11</sup>/<sub>14</sub> موزخ 16:00 بجے اس وقت لنگر خانہ میں جو کچھ ہوا۔ بالخصوص وہاں کے عہدہ داروں کے ساتھ ساتھ۔

14 والی حلالی 19<sup>11</sup>/<sub>14</sub> موزخ 17:45 بجے میں وہاں جو کچھ ہوا۔ بالخصوص وہاں کے عہدہ داروں کے ساتھ ساتھ۔

بیان اذان محمد بن عبد الوہاب ۱۲۶۱ھ خورشیدی ۱۲۰۱ھ

بیان کیا کہ خورشید ۱۵/۱۴ ۲۱ کو صبح نے ظہر کی اور خورشیدی ۲۰ کو صبح نے ظہر کی  
حاضر کی اور پورٹ کی۔ سالانہ خیر عادل آڈیٹ مان ۸۷۷ کو صبح نے چارج  
لینے کا کیا جس نے بیان کیا کہ میں چارج تیار کر رہا ہوں۔ جب  
چارج خیر عدالت تیار ہو جائے تو چارج دے دیں گا۔ اس دوران  
حرم الحرام نے آیام تھے سرکاری اسلام و ایجوکیشن لوئس ایلوارڈ  
پر تقسیم ہو گئی تھی۔ خورشید ۶/۱۴ کو عادل رحمان عبدالقادر نے  
ساتھ یوم رضعت پرفان خود روانہ کی تھی۔ جس میں ان کے  
افران بالا کنسل ہوئی۔ خورشید ۱۳/۱۴ کو عادل رحمان عبدالقادر  
کو ذرا لٹم وائل ۹۵۳۰۳۲۸-۰۳۳۳ لرا طارغ دینے کی  
کو ششنگ کی گئی۔ مگر مذکورہ ماحول وائل فون نہ آ سکا تھا۔  
پھر ذرا لٹم مینیم اطلاع دی گئی۔ جس کا رپورٹ قواعد ورات  
۵-۱۱ روزنامہ ۱۵/۱۴ ۲۰۱۴ ۱۳/۱۴ روزنامہ ہے۔ عادل مذکورہ  
جو شام تک حاضر نہیں آیا۔ پھر قواعد ورات ۱۵/۱۴ روزنامہ ۱۳/۱۴  
کو باقادرہ غیر حاضر کیا۔ ورا ۱۶/۱۴ کو حاضر کی  
کے خورشید ۱۹/۱۴ کو صبح چارج کو چارج وائل کی گئی۔ خورشید ۲۰/۱۴  
کو پولیس اسٹیشن روانہ کیا گیا۔ یہ صبر بیان ہے۔

Hussain  
Shah  
MHC-8-GAT  
01-12-014

حرم: ملازم اہلکار

نذر - (وجہ دیا گیا)

عادل عبدالقادر  
01-12-2014