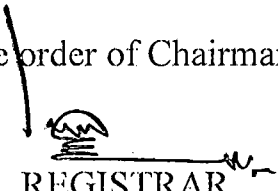


Form- A

## FORM OF ORDER SHEET

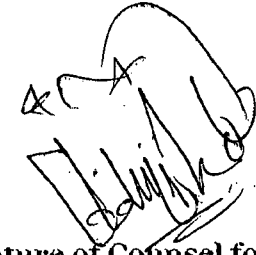
Court of \_\_\_\_\_

Case No.- 1521/2022

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge   |
|-------|---------------------------|--|
| 1     | 2                         | 3  |
| 1-    | 24/10/2022                | <p>The appeal of Mr. Hafcez-ur-Rehman resubmitted today by Mr. M. Masood Khan Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;"><br/>REGISTRAR</p> |

**PROFORMA ANNEX WITH PLAINET/APPEAL/APPLICATION/REVISION  
COMPLAINT AT THE TIME OF INSTITUTION**

| <u>S.NO</u> | <u>DESCRIPTION</u>  |   |
|-------------|---|---|
| 1           | Title of Case   | فیروز الرحمان بنا کو ریٹائرمنٹ K P K                          |
| 2           | Nature of Case  | سروس لیٹل   |
| 3           | Jurisdiction of Court   | سروس ٹریبیونل   |
| 4           | Name of Plaintiff/Appellant/Petitioner/Complainant                            | فیروز الرحمان   |
| 5           | Contact Number of Plaintiff/Appellant/ Complainant                            | 03105776134   |
| 6           | Name of Defendant/Respondent/Accused(Before Trial Court)                      | کو ریٹائرمنٹ K P K  |
| 7           | Contact Number of Defendant/Respondent/Accused(Before Trial Court)            | 03105776134   |
| 8           | Name and Contact Number of Counsel Plaintiff/Appellant/Petitioner/Complainant | محمد مسعود خان / توپیر احمد خان<br>0321-5235882 / 03335489144 |
| 9           | Name and Contact Number of Counsel of Defendant/Respondent/Accused            | NIL   |


  
 Signature of Counsel for the Plaintiff/  
 Appellant/Petitioner/Complainant

The appeal of Mr. Hafeez-ur-Rehman Khan son of Lateef Khan Ex-Constable belt no. 113 investigation wing A.Abad received today i.e. on 20.10.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- The law under which appeal is filed is not mentioned.✓
- 2- Copy of reinstatement order mentioned in para-4 of the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Check list is not attached with the appeal.
- 4- Appeal has not been flagged/marked with annexures marks.
- 5- Annexures of the appeal may be attested.
- 6- Respondents be numbered.
- 7- Chamber/gmail address of the counsel is not mentioned on the index/wakalat nama.
- 8- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2870 /S.T,

Dt. 20/10 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. M.Masood Khan Adv. A.Abad.

Registrar Service Tribunal  
Khyber Pakhtunkhwa  
Peshawar.

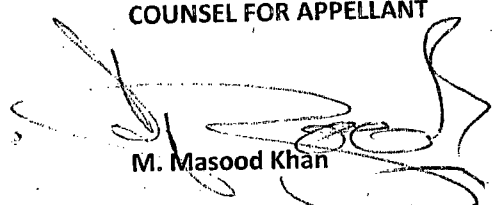
**SUBJECT: RESUBMISSION OF APPEAL AFTER COMPLETION OF REMOVAL OF ALL OBJECTIONS.**

Respected Sir,

1. That the appeal was filed before the honourable court on 20-10-2022.
2. That the office of the Registrar returned the file to the appellant on 20-10-2022 for completion and resubmission.
3. That all the objections have been removed and the appeal is being resubmitted.

It is therefore humbly requested to accept the appeal and fix the same before the Honourable Court.

**COUNSEL FOR APPELLANT**

  
**M. Masood Khan**

**Advocate High Court-Abbottabad.**

**Dated: 24-10-2022.**

**BEFORE THE SERVICES TRIBUNAL PESHAWAR, CAMP COURT  
ABBOTTABAD.**

Service Appeal no. 1521/22

Hafeez ur Rehman Khan s/o Abdul Lateef Khan, Ex- Constable belt no.113  
(investigation wing) Abbottabad, r/o village dhodial P.O Box nawasher Tehsil &  
District Abbottabad.

...Appellant

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Home, KPK.
2. Inspector General (PPO) KPK.
3. Deputy Inspector General (RPO) of police Hazara Region, Abbottabad.
4. District Police Officer Abbottabad.

...Respondents

**APPEAL**

**INDEX**

| <b>S.No</b> | <b>Description</b>  | <b>Page Nos.</b> | <b>Annexure</b> |
|-------------|---|------------------|-----------------|
| 1.          | Appeal along with affidavit                                   | 1-4              | --              |
| 2.          | Charge Sheet  | 5                | "A"             |
| 3.          | Statement of Allegation                                       | 6                | "B"             |
| 4.          | Dismissal order dated 07-04-2022                              | 7                | "C"             |
| 5.          | Copy of Appeal against dismissal order & reinstatement order. | 8-10             | "D" & "D-1"     |
| 6.          | Copy of inquiry report along with better copy.                | 11-17            | "E"             |
| 7.          | Copy of order dismissing appeal                               | 18               | "F"             |
| 8.          | Wakalat Namas   | 19-20            |                 |

**Appellant**

**Through**

  
M. Masood Khan

Advocate High Court.

Email: [emthree2001@gmail.com](mailto:emthree2001@gmail.com)

Phone: 0321-5235882.



**BEFORE THE SERVICES TRIBUNAL PESHAWAR, CAMP COURT  
ABBOTTABAD.**

Service Appeal no. 1521/22

1. Hafeez ur Rehman Khan s/o Abdul Lateef Khan, Ex-Constable belt no. 113 investigation wing Abbottabad, r/o village dhodial P.o Box nawasher Tehsil & District Abbottabad.

**...APPELLANT**

**VERSUS**

1. Govt of Khyber Pakhtunkhwa through Secretary Home, KPK.
2. Inspector General (PPO) KPK.
3. Deputy Inspector General (RPO) of Police Hazara Region, Abbottabad.
4. District Police Officer Abbottabad.

**...RESPONDENTS**

**APPEAL UNDER SECTION 4 OF KP SERVICE TRIBUNAL ACT 1974 AGAINST ILLEGAL  
AND MALAFIDE DISSMISSAL FROM SERVICE ORDER DATED: 21-09-2022.**

**Respectfully Sheweth: -**

**Brief facts giving rise to the instant appeal are as under: -**

1. That the appellant Constable Hafeez ur Rehman, no. 113 posted in the investigation wing Abbottabad was accused by the police department for selling CDRs to vested interest in lieu of heavy bargaining.
2. He was charge sheeted along with summary of allegations and a committee comprising of Additional Superintendent of Police & Superintendent of Police investigation Abbottabad found him responsible for his misconduct and recommended a major punishment.

**(Charge sheet & statement of allegations are Annex "A" & "B")**

3. That the DPO Abbottabad dismissed him from service on 07-04-2022.

**(Copy of order is Annex-C)**

4. That a departmental appeal was filed on 27-04-2022 in which *de novo* inquiry was ordered and the appellant was reinstated for the purpose of inquiry which was carried out by SP investigation Mansehra.

**(Copy of Appeal is Annex "D" & D-1)**

5. That in fresh inquiry the appellant was again held responsible for gross misconduct.

(Copy of inquiry report along with better copy is Annex-E)

6. That his dismissal order from service was retained on 21-09-2022 while dismissing his appeal. (Copy of order is Annex-F)

**GROUND:** -

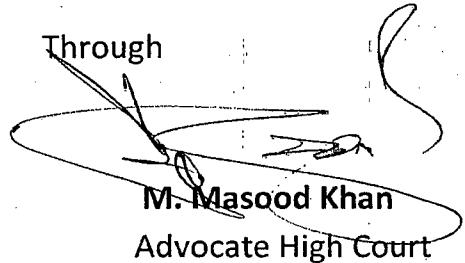
- a. That the accused was charged with selling of CDRs and neither evidence of sale of the CDRs was available nor investigated.
- b. That the accused has conceded the fact that he had shared the CDR with another police official which is a matter of routine.
- c. That he was also accused of bribing the inquiry officer who was given Rs.50000/- by the appellant which fact was also conceded by the appellant and it was stated that this was not a bribe but assistance given to a brother police official.
- d. That despite this the inquiry officials of the police were inimical towards the appellant and it was a foregone conclusion that they shall decide the matter against the appellant.
- e. That although they have asserted in their inquiry reports that an opportunity was provided to the appellant to cross examine the witnesses he was in fact threatened with arrest and torture and hence could not appear before the inquiry committee.
- f. That the inquiry reports are based on the alleged confession of the appellant and if so, his confessional statement has to be looked at in toto and no pick and choose is allowed.
- g. That the allegations stated that the CDR provided to an irrelevant person were misused but no inquiry was conducted into what misuse was made of the CDR and the person misusing the CDR was neither charged nor examined.

- h. That it was totally irrelevant to the inquiry that the appellant attended his office on a holiday or that his email ID was hacked a few years ago.
- i. That nowhere in the confessional statement was it stated that the CDR was sold and yet the inquiry committee presumed the same.
- j. That the subsequent inquiry has also relied upon the first inquiry which had already been set aside.
- k. That the instant appeal against the dismissal order dated 21-09-2022 is well in time.

**It is therefore, most humbly prayed that the impugned order of dismissal dated 21-09-2022 be set aside and the appellant be restored in service with all back benefits.**

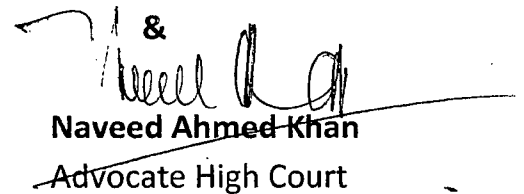
...APPELLANT

Through



**M. Masood Khan**  
Advocate High Court

&



**Naveed Ahmed Khan**  
Advocate High Court

**VERIFICATION:**

Verified on oath that the contents of foregoing petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Dated: 12/10/2022



...APPELLANT



4

**BEFORE THE SERVICES TRIBUNAL PESHAWAR, CAMP COURT  
ABBOTTABAD.**

Hafeez ur Rehman Khan s/o Abdul Lateef Khan, Ex-Constable belt no. 113  
investigation wing Abbottabad, r/o village dhodial P.o Box nawasher Tehsil &  
District Abbottabad.

**...APPELLANT**

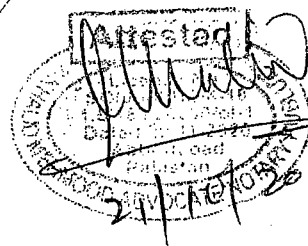
**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Home, KPK.
2. Inspector General (PPO) KPK.
3. Deputy Inspector General (RPO) of Police Hazara Region, Abbottabad.
4. District Police Officer Abbottabad.

**...RESPONDENTS**

**AFFIDAVIT**

I, Hafeez ur Rehman s/o Abdul Lateef Khan, r/o r/o village dhodial P.o Box  
nawasher Tehsil & District Abbottabad, do hereby solemnly affirm and  
declare on oath that the contents of foregoing appeal are true and  
correct to the best of my knowledge and belief and nothing has been  
concealed from this Honourable Court.



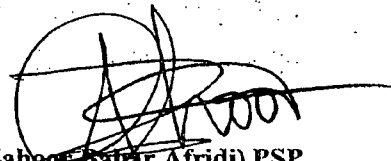
**DEPONENT**

Dated: 11/10/2022



CHARGE SHEET

- 1). I, **Zahoor Babar Afridi (PSP) District Police Officer Abbottabad** as competent authority hereby charge you **Constable Hafeez No. 113** as explained in the attached statement of allegations.
- 2). You appear to be guilty of misconduct under Police Disciplinary Rules 1975 (amended 2014) and have rendered yourself liable to all or any of the penalties specified in the said Police Disciplinary Rules.
- 3). You are therefore, directed to submit your written defense within seven days on the receipt of this Charge Sheet to the Enquiry Officer.
- 4). Your written defense, if any shall reach the Enquiry Officer within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall follow against you.
- 5). Intimate whether you desire to be heard in person or otherwise.
- 6). A statement of allegations is enclosed.

  
(Zahoor Babar Afridi) PSP  
District Police Officer  
Abbottabad

*Attested*  
  
**Masood Khan**  
Advocate High Court

(6)

ANNEX 'B'

DISCIPLINARY ACTIC

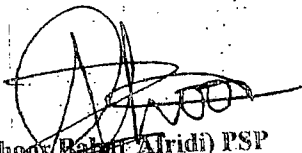
I, Zahoor Babar Afridi (District Police Officer Abbottabad as Competent Authority of the opinion that you Constable Hafeez No. 113 rendered yourself liable to be proceeded against as you committed the following act/omission within the meaning of Police Disciplinary Rules 1975 (amended 2014).

STATEMENT OF THE ALLEGATIONS

- I. The foul and avaricious play which you deceitfully did had come into the notice of Senior Officer as well as undersigned that you while posted as Incharge Technical Unit at Regional Police Office Abbottabad for the sole aim to extend assistance to Hazara Police in detection of high profile criminal cases and also to toe die-hard criminals. You misused the official system and betrayingly started illicit and unlawful business of selling CDRs to vested interests in lieu of heavy bargaining. The standing precedence accordingly is quoted as under:-
  - a) Reportedly one CDR which was provided to irrelevant person who mis-used it, came into the notice of Worthy Regional Police Officer Hazara Region, PSO was directed to probe into the matter as to whether who and how the CDR was procured.
  - b) During initial enquiry you denied the spirit of allegations and took plea that due to gazetted holiday on 25<sup>th</sup> December 2021 you did not attended office on that day. Subsequently, during discreet probe it was proved that you remained present in your office on 25<sup>th</sup> December, 2021 for 03 hours. You also pretended that once your email ID was hacked few years ago which you changed.
  - c) On 2<sup>nd</sup> February 2022 you were called by PSO to RPO where you verbally confessed that you requested for the provision of CDR and sold out the same to one of his contact person. You absented yourself from 3<sup>rd</sup> February 2022 till date.
  - d) On 04 Feb, 2022 at about 18:15 hours you went to the house of Enquiry Officer and offered him an illegal gratification/ bribe of Rs. 50,000/-.

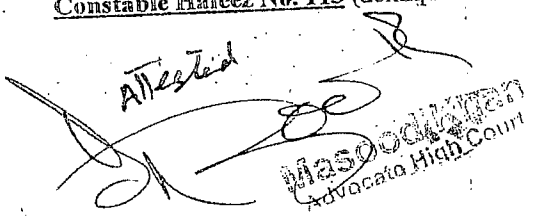
All this shows your ill-will in the performance of official duties. Your this ignoble act is a sever violation, a professional dishonesty, mala fide intention and gross misconduct in term of police E&D Rules-1975, hence this charge sheet.

- 2). For the purpose of scrutinizing your conduct with reference to the above allegations, Addl. SP, Attd is hereby appointed as Enquiry officer.
- 3). The Enquiry Officer shall in accordance with the provision of this ordinance, provide reasonable opportunity of hearing to you, record finding and make within 25 days of the receipt of this order, recommendation as to punishment or the appropriate action against you.
- 4). You are hereby directed to attend the proceedings on the due date, time and place fixed by the Enquiry Officer.

  
 (Zahoor Babar Afridi) PSP  
 District Police Officer  
 Abbottabad

No: 38 /PA, Dated Abbottabad the 11/02/2022.  
Copy to:

1. Enquiry Officer for initiating proceedings against the defaulter officer under provisions of the Police Disciplinary Rules 1975 (amended 2014) and submit findings within stipulated period.
2. Constable Hafeez No. 113 (delinquent officer/ official).

Attested  
  
 Masood Khan  
 Advocate High Court

(7)

ANNEX 'C'

**ORDER**

This office order will dispose of the departmental enquiry against Constable Hafeez No. 113 the then Technical Branch RPO Office. The foul and avaricious play which he deceitfully did had come into the notice of Senior Officer as well as undersigned that he while posted as Incharge Technical Unit at Regional Police Office Abbottabad for the sole aim to extend assistance to Hazara Police in detection of high profile criminal cases and also to toe die-hard criminals. He misused the official system and betrayingly started illicit and unlawful business of selling CDRs to vested interests in lieu of heavy bargaining. The standing precedence accordingly is quoted as under:-

- a) Reportedly one CDR which was provided to irrelevant person who mis-used it, came into the notice of Worthy Regional Police Officer Hazara Region, PSO was directed to probe into the matter as to whether who and how the CDR was procured.
- b) During initial enquiry he denied the spirit of allegations and took plea that due to gazetted holiday on 25th December 2021 he did not attended office on that day. Subsequently, during discreet probe it was proved that he remained present in his office on 25th December, 2021 for 03 hours. He also pretended that once his email ID was hacked few years ago which he changed.
- c) On 2nd February 2022 he was called by PSO to RPO where he verbally confessed that he requested for the provision of CDR and sold out the same to one of his contact person. He absented himself from 3rd February 2022 till date.
- d) On 04 Feb, 2022 at about 18:15 hours he went to the house of Enquiry Officer and offered him an illegal gratification/ bribe of Rs. 50,000/-.


All this shows his ill-will in the performance of official duties. His this ignoble act is a sever violation, a professional dishonesty, malafide intention and gross misconduct in term of police E&D Rules-1975.

He was issued with Charge Sheet along with statement of allegations. Enquiry Committee comprising of Addl: SP Abbottabad and SP, Investigation Abbottabad was appointed. The committee conducted proper departmental enquiry against the delinquent official and recorded statements of all concerned. After conducting proper departmental enquiry, the Enquiry Committee submitted its findings wherein allegations have been proved against delinquent official. He was issued Final Show Cause. He was summoned to appear in Orderly Room on 06-04-2022. He was given a patient hearing but he had nothing plausible to state in his defence.

Therefore, in exercise of the powers vested in the undersigned Police Disciplinary Rules-1975 (Amended 2014), I, Zahoor Babar Afridi, PSP, District Police Officer, Abbottabad as a competent authority, am constrained to award him the major punishment of **Dismissal from service** with immediate effect.

Order announced.

OB No. 77  
Dated 7-4-22

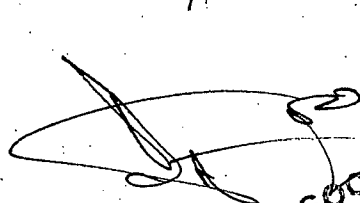
  
District Police Officer  
Abbottabad

CC.

1. OASI, DPO Office Abbottabad alongwith Enquiry file containing (47) pages for completion of record.

\*\*\*\*\*

*Attested*

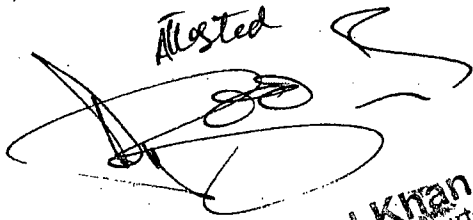
  
Masood Khan  
Advocate High Court

APPEAL BEFORE FIRST APPEALATE AUTHORITY ( RPO HAZARA) AGAINST DISMISSEL ORDER

PASSED BY DPO ATD VIDE OB NO.79 DATED 07/04/2022

1. With due respect and complements, I submit following submissions with the anticipation of yours kind and just consideration.
2. That I served police department for 23 Years and remained posted at various appointments.
3. That since from 2009 I remained posted as Incharge Police Technical Unit Hazara at Abbottabad.
4. That I worked round the clock and remained helping hand for whole of Hazara Region Police in terms of detection of crimes, arrest of dangerous criminals. it was mainly due to my zeal, fever, and devotion to duty that in most of blind cases it had become challenging even for (RPO Hazara and DPOS, SP investigation of concerned Districts.
5. That high profile cases accoutered, the criminals were traced out and their arrest was made within shortest time duration from certain nooks and corners of Pakistan.
6. That during my services I have never been charged or charge sheeted for dishonesty or anti departmental interest.
7. That I do not own the spirit of allegation as incorporated in the charge sheet in order of dismissal having no truthfulness in them.
8. That all this had been done with maliciousness pre-plan thereby making me scapegoat for no fault of mine.
9. That the Enquiry Committee was several time requested by me not to become under any influence rather to conduct the enquiry fairly, impartially and strictly in

*Attested*



**Masood Khan**  
Advocate High Court

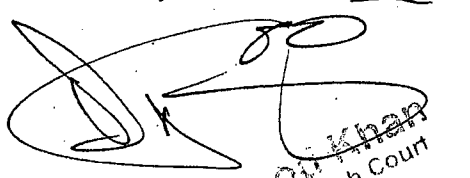
(9)

accordance to the canon of Justice. The outlook of Enquiry Committee was always biased and unjustified.

10. The punishment of dismissal awarded to me is not only harsh, inconsistent with the norms of justice and against the humanity but also a follow up of merciless orders of their senior.
11. That now I have reached the age of 46 years and obviously I am unfit for future appointed in any Govt: Department therefore keeping in view the penury, myself and my dependents are feared to die with starvation.
12. Therefore it is humanly prayed that the impugned order of dismissal may kindly be set aside and to re-instate my services.
13. I shall pray for your longevity prosperity.

~~Signature~~ 27/4/22  
Name: HAFEEZ UR REHMAN  
Belt No.113 X KPK Police District Abbottabad.

DY NO - 5550/PA  
27-4-22

Attested R  
  
Masood Khan  
Advocate High Court

7C



OFFICE OF THE REGIONAL POLICE OFFICER  
HAZARA REGION, ABBOTTABAD

☎ 0992-9310021-22

☎ 0992-9310023

✉ r.rpolhazara@gmail.com

NO: 42-44/PA DATED 28/07/2022

**ORDER**

Ex-Constable Hafeez ur Rehman No 113 of district Abbottabad is hereby provisionally reinstated in service for purpose of de-novo enquiry proceedings initiated against the official vice Region Office Memo No. 15753-54/PA dated 29-06-2022 till further orders.

*Mirza Niaz*  
Mirza Niaz  
REGIONAL POLICE OFFICER  
HAZARA REGION, ABBOTTABAD

- 1. District Police Officer, Abbottabad for necessary action and with the direction to inform the official accordingly.
- 2. SP Investigation, Manshera with reference to his office Memo No. 22187/PA/Inv. dated 20-07-2022 with the direction to complete the enquiry proceedings at earliest.

5303 ✓  
29/7/22 CAS / SP Inv.  
For information  
*[Signature]*  
D/O Manshera  
28/7

Sr. Superintendent of Police  
Investigation Abbottabad  
Inv. No. 755  
Dated 27-07-2022

Attested  
*[Signature]*  
Masood Khan  
Advocate High Court

*[Signature]*  
*[Signature]*  
SP Inv. AD  
28/7/22

(11)

ANNEX E

FINDINGS

This is a departmental enquiry against Const. Haseeb ul Rehman No. 113 presently posted at Investigation Wing, Abbottabad. It was entrusted to the undersigned by the worthy Regional Police Officer, Hazara Region, Abbottabad, vide his good office letter no. 15758 dated 23/12/2021.

It transpired from perusal of record/enquiry already conducted by a committee comprising of Additional Commissioner of Police and Superintendent of Police Division of Abbottabad against above named official, upon Charge Sheet and Statement of Allegations, issued to him by the District Police Officer, Abbottabad, for the allegations which are reproduced below.

The foul and avaricious play which you deceitfully did had come into the notice of Senior Officer as well as undersigned that you while posted as Incharge Technical Unit at Regional Police Office Abbottabad, for the sole aim to extend assistance to Hazara police in detection of High profile criminal cases and also to the die-hard criminals. You misused the official system and betrayingly started a not and uniparful business of selling CDRs to vested interest in lieu of heavy bargaining. The standing precedence accordingly is quoted as under:-

- a) Reportedly one CDR which was provided to irrelevant person who misused it, came into the notice of Worthy Regional Police Officer, Hazara Region, PSO was directed to probe into the matter as to whether who and how the CDR was procured.
- b) During initial enquiry you denied the spirit of allegation and took plea that due to gazetted holiday on 23<sup>rd</sup> December 2021 you did not attend office on that day. Subsequently, during discreet probe it was proved that you remained present in your office on 23<sup>rd</sup> December, 2021 for 03 hours. You also pretended that once your email ID was hacked few years ago which you changed.
- c) On 2<sup>nd</sup> February 2022 you were called by PSO to RPO where you verbally confessed that you were requested for the provision of CDR and sold out the same to one of his contact person. You absented yourself from 5<sup>th</sup> February 2022 till date.
- d) On 04 February 2022 at about 16:15 hours you went to the house of Enquiry Officer and offered him an illegal gratification/bribe of RS: 50,000/-.

All this shows your ill-will in the performance of official duties. Your this ignoble act is a serious violation, a professional dishonesty, malafide intention and gross misconduct in term of Police ESO Rules-1975, hence this charge sheet." (Khyber Pakhtunkhwa Police Rules 1975 with amendment 2014)

Earlier the enquiry committee conducted a detail enquiry into the allegations which were leveled against above named defaulter official by associating him alongwith witnesses with enquiry proceedings to ascertain the real facts. The enquiry committee after conducting enquiry into the matter submitted its finding to the District Police Officer, Abbottabad, in which they held responsible above named defaulter official for the allegations leveled against him. District Police Officer, Abbottabad issued him Final Show Cause Notice in response to which he submitted his written explanation. He was also called for CDR and his reply and other explanations were found not satisfactory. Thus defaulter official for the above mentioned allegations was awarded major punishment of dismissal from service of District Police Officer, Abbottabad.

Departmental appeal before the appellate authority (worthy Regional Police Officer, Hazara Region, Abbottabad) upon which comments from District Police Officer, Abbottabad were submitted. But the appellant avariciously marked devious strategy, on the basis of which a new letter referred to above.

The undersigned vide this office letter no. 2255 dated 23/12/2021 entrusted the matter to the District Police Officer, Hazara Region, Abbottabad, for the same to be conducted in accordance with the provisions of Police Order No. 12-44/PA dated 26/11/2012 for the purpose of...

CC: NS and...



**ENQUIRY PROCEEDINGS**

During the course of enquiry the undersigned summoned following PWs and the alleged defaulter official Constable (Police) of Rehman No. 113, former in-charge, Technical Branch, Cellular Forensic, Regional Police Office, Abbottabad

PW-1 (IC Naz Gul No. 222, Technical Branch, Cellular Forensic at Regional Police Office, Abbottabad)

PW-2 Const: Mahtab Ahmed No. 662, Technical Branch Cellular Forensic, at Regional Police Office, Abbottabad.

PW-3 Const: Khurshid No. 143, while On duty at gazetted duty at Regional Police Office, Hazara Region

PW-4 DSP Khaliq Muhammad, PSO to Worthy Regional Police Officer, Hazara Region, Abbottabad

On 15.07.2022, PW-1; PW-2 named above and alleged defaulter official Const: Mahtab Ahmed Rehman No. 113 appeared, I examined above mentioned PWs in presence of alleged defaulter official and subsequently recorded their statements which are available to enquiry file as ready reference

Both of them admitted that when irrelevant number, not demanded/required by any District of the Region in any criminal case was obtained during that day Const: Mahtab Ahmed No. 113, was performing duty as in-charge of Technical Branch, Cellular Forensic, Regional Police Office, Abbottabad, and he was competent for sending requests to the concerned cellular mobile company from official email address i.e. [mahtab113@pso.gov.pk](mailto:mahtab113@pso.gov.pk) both of them also expressed their ignorance regarding COR of irrelevant cell phone number which was obtained by the alleged defaulter official and subsequently it was used for harassment of victim

PW-3, Const: Khurshid No. 143, while posted at gazetted duty at Regional Police Office Hazara Region, Abbottabad, stated that on 25.12.2021, he was present on duty at said office when Constable Mahtab Rehman No. 113, in-charge Technical Branch, Cellular Forensic, Regional Police Office, Abbottabad, attended the office when it was gazetted holiday

PW-4, On 18.07.2022 DSP Khaliq Muhammad, PSO to Worthy Regional Police Officer Hazara Region, Abbottabad, and alleged defaulter official appeared and joined enquiry proceedings They were put to question answer session and I recorded the statement of DSP Khaliq Muhammad in presence of defaulter official. He stated in his statement that Technical Cellular Branch, Regional Police Office, Abbottabad, is responsible for providing technical assistance to the Police of Hazara Region with reference to CDR, locations, IMEI's search etc, for tracing/localizing of accused who are involved in different crimes. During his 14 year posting period, Constable Mahtab Rehman No. 113, has been working since then as in-charge of said branch. He stated that there were clandestine informations received by the high ups that above named alleged defaulter official was involved in illegal/unlawful business of selling CDRs in lieu of heavy bargaining to irrelevant persons by misusing his official status as well as official system, which was provided to him for official business. He also generated irrelevant CDRs of victim women subsequently used for their harassment. Due to his such illegal activities reputation of police department was badly damaged. He deposed that on 25.12.2021, a gazetted holiday, alleged defaulter official attended office and obtained an irrelevant CDR, through official email which was not required in any criminal case or official business. He highlighted that defaulter official has also sent a request from official email address as mentioned above to cellular company for his vested interest, in lieu of illegal gratification, and obtained CDR of a lady victim's cell ID: 91311452243, which was subsequently used for her harassment and stalks, upon which Cyber Crimes Reporting Center, RA Islamabad, has also initiated another enquiry against him for abusing authority and official system to

that he was entrusted with facts finding enquiry in this regard. The defaulter official visited his home without his cell being located and he was away, which matter he reported to the high ups and the recovery room at Abbottabad Police as a crime. After enquiry PWs were examined the PWs but he was not able to provide any information in response to queries/interrogation asked by the undersigned. I conducted a fact finding enquiry in which he found him guilty for the charges sheet and statement of Allegations later on 18/07/22

During further course of enquiry alleged defaulter official namely Constable Hafiz ur Rahman No.113 the then Incharge, Technical Branch, Cellular Forensic, Regional Police Office, Manshera, was summoned time and again to appear and give record his statement or to produce any evidence in his defense to prove himself innocent, if any, but he neither came nor attended his cell phone number which he switched off to avoid contact or to join the enquiry proceedings. He wanted to linger on said enquiry or to get rid of it by using such delaying tactics. He deliberately escaped from facing said enquiry as he had realized from statement of PWs so recorded in his presence and he was given ample opportunities to cross examine the PWs but sufficient evidence exists against him in support of allegations leveled against him. There is no hope/possibility of his coming in near future to join enquiry proceedings for recording his statement. Therefore, it is concluded unilaterally, to the extent of his appearance for recording his statement.

CONCLUSION:

Keeping in view the above circumstances coupled with statements of PWs named above and record of official email, through which the alleged defaulter official namely Hafiz ur Rahman No.113, Constable, managed to get generate irrelevant CDR for illegal gains by using his job for his personal advantages and he violated the SOP set for generating/providing CDRs to Police of Hazara Region, in criminal cases for its detection and arrests of hadder criminals, besides he ruined the reputation of police department. Therefore, allegations leveled against him in the charge sheet and statement of allegations have been prove and he being found guilty of the allegations is recommended for major punishment.

Submitted, please

Superintendent of Police  
Investigation Manshera

*Attest*

Masood Khan  
Advocate High Court

(14)

BEETER COPY

### FINDINGS

This is denove department enquiry against Const: Hafeez ur Rehman No.113 presently posted at investigation Wing, Abbottabad, It has been entrusted to the undersigned by the worthy Regional Police Officer, Hazara Region, Abbottabad, vide his good office letter No.15753-54-PA dated 29/06/2022.

It transpired from perusal of record/enquiry already conducted by a committee comprising of Additional Superintendent of Police and Superintendent of Police Investigation of Abbottabad against above name official, upon Charge Sheet and Statement of allegations, issued to him by the then District Police Officer, Abbottabad for the allegations which are reproduced below.

“The foul and avaricious play which you deceitfully did had come into the notice of Senior Officer as undersigned that your while posted as Incharge Technical Unit at Regional Police Officer Abbottabad for the sole aim to extend assistance to Hazara Police in detection of High profile criminal cases and also to toe die-hard criminals. You misused the official system and betrayingly started illicit and unlawful business of selling CDRs to vested interest in lieu of heavy bargaining. The standing procedure accordingly is quested as under;-

- a) Reportedly once CDR which was provided to irrelevant person who misused it came into the notice of Worthy Regional Police Officer, Hazara Region, PSO was directed to probe into the matter as to whether who and how the CDR was produced.
- b) During initial enquiry you denied the spirit of allegation and took plea that due to gazetted holiday on 25<sup>th</sup> December 2021 you did not attend office on that day. Subsequently, during discreet probe it was proved you remained present in your office on 25<sup>th</sup> December, 2021 for 03 years. You also pretended that once your email I.D was few years ago which was changed.
- c) On 2<sup>nd</sup> February 2022 you were called by PSO to RPO where you verbally confused that you were requested for the provision of CDR and said out the same to once of his contact person. You absented yourself from 3<sup>rd</sup> February 2022 till date.
- d) On 04 February 2022 at about 18:15 hours you went to the house of Enquiry Officer and offered him an illegal gratification/bride of Rs.50,000/-.

All this shows, you ill-will in the performance of official duties. You this ignoble acts is a serve violation, a professional dishonesty, malafide intention and gross misconduct in term of Police E&D Rules, 1975, hence this charge sheet. “(Khyber Pakhtunkhwa Police Rule 1975 with amendment 2014).

Earlier the enquiry committee conducted a detail enquiry into the allegation which were leveled against above named defaulter

official by associating him alongwith witnesses with enquiry proceedings to ascertain the real facts. The enquiry committee after conducting enquiry into the matter submitted its finding to the District Police Officer, Abbottabad, in which they held responsible above named defaulter official for the allegation leveled against him District Police Officer, Abbottabad issued him final show cause notice in response to which he submitted his written explanation. He was also hard in "OR" but his reply and other explanations were found not satisfactory. Thus defaulter official being found guilty for the allegations was awarded major punishment of dismissal from service vide 08 No.79 dated 07/04/2022 of District Office, Abbottabad.

He submitted departmental appeal before the applicant authority (worthy Regional Police Officer, Hazara Region, Abbottabad upon which comments from District Police Officer, Abbottabad were sought which were submitted but the appellate authority marked denove enquiry to the undersigned vide his good officer letter referred to above.

On request of the undersigned vide his office letter No.2288/PA Inv: dated 20/07/2022 the Worthy Regional Police Officer, Hazara Region, Abbottabad, provisionally reinstated above named defaulter official in service vide Order No.42-44/PA dated 28/07/2022 for the purpose of denove enquiry proceedings.

**ENQUIRY PROCEEDINGS:-**

During the courts the undersigned summoned following PWs and the alleged defaulter official committee Hafeez ur Rehman No.153 former incharge, Technical Branch Cellular Forensic, Regional Police Officer, Abbottabad.

PW-1 HC Niaz Gul No.222, Technical Branch, Cellular at Regional Police Officer, Abbottabad PW-2 Const: Mehtab Ahmed No.662, Technical Branch Cellular Forensic, at Regional Police Officer.

PW-3 Const: Khursheed No.143, while then posted at guard duty at Regional Police, Office Abbottabad.

On 15.07.2022, PW-1, PW-2 named above and alleged defaulter official Const: Hafeez ur Rehman No.113 appeared, I examined above mentioned PWs in preference presence of alleged defaulter official and subsequently recorded their statements which are available on enquiry files as ready reference.

Both of them admitted that when irrelevant number, not demanded/required by any District of the Region in any criminal case was obtained during that days Const. Hafeez ur Rehman No.113, was performing duty as incharge of Technical Branch, Cellular Forensic, Regional Police Officer, Abbottabad, and he was competent for sending requests to the concerned cellular mobile company from official email address i.e. rpo hazara@gmail.com Both of them also expressed their ignorance regarding CDR of irrelevant cell phone number which was obtained by the alleged defaulter official and subsequently it was used for harassment of victim.

PW-3 Const. Khursheed No.143, while posted at guard duty at Regional Police Officer Hazara Region, Abbottabad stated that on 25/12/2022, he was present on duty at said office when constable Hafeez ur Rehman No.113, Incharge Technical Branch, Cellular Forensic, Regional Police Office, Abbottabad, attended the office while it was gazetted holiday.

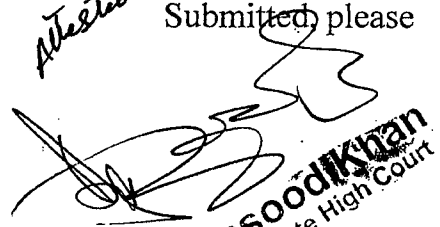
PW-4 On 18/07/2022 DSP Khabir Muhammad, PSO to Worthy Regional Police Officer, Hazara Region, Abbottabad and alleged defaulter official appointed and joined enquiry proceedings. They were put to questions answer session and I recorded the statement of DSP Khabir Muhammad on presence of defaulter official. He stated in his statement that Technical Cellular Branch, Regional Police Office, Abbottabad, is responsible for providing technical assistance to the police of Hazara Region with reference to CDR, locations, IMEIs search etc, for tracing/locating of accused who are involved in different crimes. During his 1% year posting period. Constable Hafeez ur Rehman No.113, had been working since then as incharge of said branch. He stated that there were clandestine information received by the high ups that above named alleged defaulter official was involved in illegal/unlawful business of selling CDRs in lieu of heavy bargaining to irrelevant persons by misusing his official status as well as official system, which was provided to him for official business. He also generated irrelevant CDRs of victim women subsequently used for their harassment. Due to his such illegal activities reputation of police department was badly damaged. He deposited that on 25/12/2021 a guzzetted holiday, alleged defaulter official attended office and obtained are irrelevant CDR, through official email which was subsequently used for her harassment and stalke. Upon which Cyber Crime Reporting Center FIA Islamabad, has also initiated another enquiry against him for abusing authority and official system for personal gains.

He further stated that he was entrusted with facts finding enquiry in this regard during the course of which the alleged defaulter official visited his house and forcefully took fifty thousand rupees as bribe and ran away with the matter. He reported to the high upon and that amount was taken into possession through recovery memo by Abbottabad Police as a proof. Alleged defaulter official was given opportunity to cross examination asked by the undersigned PWS stated that in this regard he already conducted a facts finding enquiry in which he found him guilty for the allegation leveled against him in the Charge sheet and statement of allegation later on issued to him by the then District Police Officer, Abbottabad.

During further course of enquiry alleged defaulter official namely Constable Hafeez ur Rehman No. 113 the then incharge, Technical Branch Cellular Forensic, Regional Police Office Abbottabad was summoned time and again to appear and get record his statement or to produce any evidence in his defense to prove himself innocent, if any, but he neither came nor attended his cell phone number which he switched off to avoid contact or to join the enquiry proceedings. He wanted to linger on said enquiry or to get rid of it by using such delaying tactics. He deliberately escaped from facing said enquiry as he had realized from statement of PWS so recorded in his presence and he was given ample opportunities to cross examine the PWs but sufficient evidence exists against him in support of allegations leveled against him. There is no hope/possibility of his coming in near future to join the enquiry proceedings for recording his statement. Therefore, it is concluded unilaterally to the extent of his appearance for recording his statement.

### CONCLUSION:

Keeping in view the above circumstances coupled with statements of PWs named above and record of official email through which the alleged defaulter official namely Hafeez ur Rehman No. 113, Constable, managed to get generate irrelevant CDR for illegal gains by using his job for his personal advantages and he violated the SOP set for generating/providing CDRs to Police of Hazara Region, in criminal cases for its detection and arrests of hardened criminals, besides he ruined the reputation of police department. Therefore, allegations involved against him in the charge sheet and statement of allegations have been proved and he being found guilty of the allegations is recommended for major punishment.

*Abstract*  
Submitted, please  
  
**Masood Khan**  
Advocate High Court

**Superintendent of Police**  
Investigation Mansehra



(182)  
OFFICE OF THE REGIONAL POLICE OFFICER  
HAZARA REGION, ABBOTTABAD

☎ 0992-9310021-22

☎ 0992-9310023

✉ r.rpohazara@gmail.com

NO: 864 /PA DATED 21/9 /2022

### ORDER

This order will dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by Ex. Constable Hafeez ur Rehman No.113 of District Abbottabad against the order of punishment i.e. *dismissal from service* awarded by DPO Abbottabad vide OB No.79 dated 07.04.2022.

Brief facts leading to the punishment are that the appellant while posted as Incharge Technical Unit at Regional Police Office, Abbottabad deceitfully misused the official CDR system and started illicit and unlawful business of selling CDRs for vested interests.

The appellant was issued charge sheet along with summary of allegations and a committee comprising Add. SP and SP Investigation Abbottabad was constituted to conduct departmental enquiry. The committee in its findings held the appellant responsible of misconduct and recommended him for major punishment for his dishonest act. Consequently, DPO Abbottabad awarded him major punishment of dismissal from service. Hence, the appellant submitted this present appeal.

After receiving his appeal, comments of DPO Abbottabad were sought and examined/perused. The undersigned called the appellant in OR and heard him in person. The appellant was given reasonable opportunity to defend himself against the charges, however he failed to advance any justification and pleaded clemency. The undersigned again provided him opportunity to defend himself against the allegations, provisionally reinstated him in service for purpose of *denovo* enquiry and directed SP Investigation, Manshera to carry out the enquiry proceedings. However, the appellant neither appeared before the enquiry officer nor produced any evidence in his defense. The enquiry officer in his findings held the appellant responsible of gross misconduct. He was called in orderly room on 14-09-2022, however he failed to appear in person (DD Report No. 20 dated 13-09-2022 is part of record)

Foregoing in view the disciplinary action taken against the appellant seems reasonable and the appeal is liable to be dismissed. Hence, in exercise of the powers conferred upon the undersigned under Rule 11-4 (a) of Khyber Pakhtunkhwa Police Rules, 1975 the instant appeal is hereby *filed/rejected* while order of dismissal from service of DPO Abbottabad is upheld with immediate effect.

Attested  
MASOOD NIAZ  
Advocate High Court

Mirvais Niaz (PSP)  
REGIONAL POLICE OFFICER  
HAZARA REGION, ABBOTTABAD

No. 865 /PA, dated Abbottabad the 21/9 /2022.

Cc.

DPO Abbottabad for information and necessary action with reference to his office Memo No 1087/PA dated 26-05-2022 with the direction to inform the appellant accordingly. Service Roll and Fuji Missal containing enquiry file of the appellant is returned herewith for record.

S.No. 179566

Name of Advocate

DBA NO.

TBA NO.

BC No.

10 - 10 94

R.s.200/=

وکالت نامہ  
BIBI SALMA  
Finance Secretary  
District Bar Association  
Abbottabad

gmail ID: emhvec2001@gmail.com  
phone - 0321-5235882

بعدالت: سروس ٹریڈ سونل K.P.K ایشیا اور  
عنوان: صفیظ اللہ خان  
مخانب: بیٹیشنر  
نوٹ: نوعیت مقدمہ سروس ایبل  
باعث تحریر آنکھ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیرونی وجوہات ہی برائے پیشی یا تصفیہ مقدمہ بمقام  
محمد سعید خان / نوید احمد خان / افاروق اکبر خان ایڈووکیٹس ایبٹ آباد کے لیے  
کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بروقت پکارے  
جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر منظر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ  
سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے  
علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ پکھری کے علاوہ کسی اور جگہ  
سماعت ہونے پر یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے  
کسی معاوضہ کے ادا کرنے یا محتانے کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرواختہ صاحب موصوف  
مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی ایبل نگرانی و ہر قسم  
درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کار و پیرو وصول کرنے اور رسید دینے اور داخل کرنے  
اور ہر قسم کے بیان دینے اور اس پر ثالثی و راضی نامہ و فیصلہ بر حلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات  
از پکھری صدر ایبل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناع یا فریق یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب  
موصوف کو بشرط ادا ہوگی علیحدہ محتانہ بیرونی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے  
کسی جزو کی کارروائی کے یا بصورت ایبل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں  
وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف  
کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ  
کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

مورخہ: 20/ اکتوبر 2022ء  
دن ماہ سال

لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے۔  
مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

نوٹ: وکالت نامہ کی فونو کاپی قابل قبول نہ ہوگی

صفیظ اللہ خان  
محمد سعید خان



S.No. 179567

Name of Advocate خاروق البرخان



20  
IBI SALMA  
Finance Secretary  
District Bar Association  
Abbottabad

DBA NO. \_\_\_\_\_ TBA NO. \_\_\_\_\_

BC No. 21-3081

R.s.200/=

بعدالت سروس ٹریبونل  
عنوان: حقیظ الرحمان  
مخانب: چیمبر  
نام: گورنمنٹ KPK وغیرہ  
نوعیت مقدمہ: سروس ایپل

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیروی و جوابدہی برائے پیشگی یا لکھنے مقدمہ بمقام \_\_\_\_\_ کے لیے

خاروق البرخان ایڈووکیٹ ایبٹ آباد

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیروی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا بختمانہ کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داختہ صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعوی یا جواب دعوی اور درخواست اجراءے ڈگری و نظر ثانی ایپل گمرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر ثبوتی و راضی نامہ و فیصلہ برحلف کرنے اقبال دعوی دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات از کچہری صدر ایپل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا تنگی علیحدہ محتانہ بیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے کسی جزوی کارروائی کے یا بصورت ایپل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے۔  
مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔  
مورخہ: 20/12/2022  
دن ماہ سال

نوٹ: وکالت نامہ کی فوٹو کاپی قابل قبول نہ ہوگی

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