

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No.3326/2020

Date of Institution ... 24.04.2020  
Date of Decision ... 02.12.2021

Abdul Wahab No.50 Ex- Constable District Police Kohat.  
... (Appellant)

**VERSUS**

Inspector General of Police Khyber Pakhtunkhwa Peshawar and  
two others.

... (Respondents)

Ashraf Ali Khattak,  
Advocate ... For appellant.

Muhammad Adeel Butt,  
Additional Advocate General ... For respondents.

Rozina Rehman ... Member (J)  
Atiq ur Rehman Wazir ... Member (E)

**JUDGMENT**

Rozina Rehman, Member(J): Appellant was Constable in the Police Department. He was dismissed from service on 16.01.2020. It is the legality and validity of this order which has been challenged by him U/S 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.

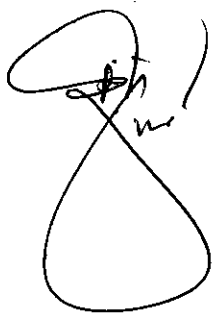
2. Brief facts leading to filing of the instant appeal are that complainant of case F.I.R No.1593 dated 15.12.2019 registered at Police Station City Kohat U/S 365 P.P.C reported regarding the kidnapping of his son by a person in Police uniform. The appellant had allegedly telephonic contact with the nominated accused in the above mentioned F.I.R before and after the occurrence. The appellant was also suspected for contact with the accused on the eventful day i.e. before and after the occurrence. He was served with charge sheet

alongwith statement of allegations, where-after, he submitted reply and after issuance of the final show cause notice, appellant was awarded major punishment of dismissal from service.

3. We have heard Ashraf Ali Khattak and Muhammad Adeel Butt, learned Additional Advocate General for the respondents and have gone through the record and the proceedings of the case in minute particulars.

4. Ashraf Ali Khattak Advocate, learned counsel for appellant, inter-alia, contends that no proper inquiry was conducted as none from the general public was examined in support of the charges leveled against the appellant. He contended that the appellant was never informed about the inquiry proceedings and that he was condemned unheard. He contended that Sub Inspector Ayat Ullah was also proceeded against departmentally on the score of charges leveled against the present appellant and that in pursuance of the judgment of this Tribunal, Ayat Ullah Sub Inspector was reinstated in service and minor punishment of stoppage of three increments without cumulative effect was imposed upon him vide order of the District Police Officer, Kohat dated 31.08.2021. Learned counsel submitted that the present appellant was Gunner with Sub Inspector Ayat Ullah and that his order of dismissal was set aside, therefore, the present appellant being Gunner with S.H.O may also be reinstated in service with all back benefits.

5. Conversely, learned AAG submitted that S.H.O Ayat Ullah and his gunners Abdul Wahab and Muhammad Abid were found in contact with the accused who was charged in case F.I.R No.1593 dated 05.12.2019 registered at Police Station City Kohat U/S 365 P.P.C. He contended that after getting C.D.R of the accused, his telephonic



contact with the accused of the aforementioned case was established, therefore, departmental proceedings were initiated against the appellant under the relevant rules and on completion of all codal formalities, he was awarded major punishment.

6. From the record it is evident that one Mst. Fatima Gul reported the matter on 3<sup>rd</sup> December 2019 that her son was taken away in a motorcar by a person wearing Police uniform. Her report was properly entered and investigation U/S 156 (III) Cr.PC was initiated which culminated in registration of F.I.R No.1593 dated 05.12.2019 U/S 365 P.P.C. Not only the present appellant Abdul Wahab but also S.H.O Ayat Ullah and his Driver Constable Abid Ali were also departmentally proceeded against on the allegations of their telephonic contact with the accused of the above mentioned criminal case. Admittedly, complainant party of case F.I.R No.1593 has patched up the matter with the nominated accused Farhad and main accused was discharged vide order of the learned Judicial Magistrate-II dated 10.10.2020. It merits a mention here that the appellant was Gunner/Constable with S.H.O (S.I. Ayat Ullah) who had been dismissed from service on the same allegation and who filed the service appeal which appeal was partially accepted and case was remanded to the Department to receive reply of the appellant to the final show cause notice within 7 days of the receipt of judgment vide judgment of this Tribunal in Service Appeal No.3325/2020. In pursuance to the directions of this Tribunal, process was initiated and S.H.O submitted his reply to the final show cause notice. He was heard in person and vide order of D.P.O Kohat dated 31.08.2021, he was reinstated into service and minor punishment of stoppage of three increments without cumulative effect was imposed upon him. The



present appellant was Gunner with S.H.O Ayat Ullah. He was not charged by the complainant of case F.I.R No.1593 dated 05.12.2019 registered U/S 365 P.P.C. The allegations in respect of contact of the present appellant with the nominated accused Farhad in case F.I.R No.1593 has also got no force as accused Farhad was not charged by the complainant party and accordingly he was discharged by a competent of Law.

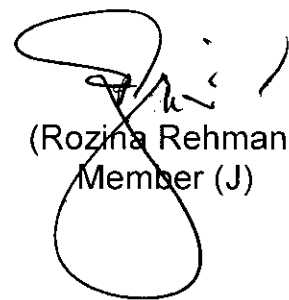
7. For what has gone above, the appeal at hand is accepted. Consequently, the impugned order of imposition of penalty with disciplinary proceedings wherefrom it resulted, are set aside and the appellant is reinstated into service from the date of his dismissal from service with all back benefits. The concerned respondent on receipt of the copy of this judgment shall issue the order of appellant's reinstatement with all back benefits having accrued or accruable from the date of his dismissal from service. With no order as to costs. File be consigned to the record room.

ANNOUNCED.

02.12.2021



(Atiq ur Rehman Wazir)  
Member (E)

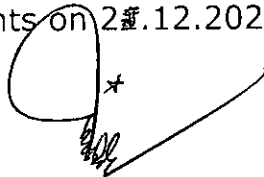


(Rozina Rehman)  
Member (J)

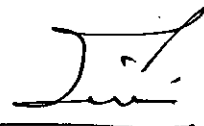
22.10.2021

Appellant alongwith his counsel present. Mr. Ishaq Gul, DSP (Legal) alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment being not prepared for arguments today. Adjourned. To come up for arguments on 28.12.2021 before the D.B.



(MIAN MUHAMMAD)  
MEMBER (E)



(SALAH-UD-DIN)  
MEMBER (J)

Order

02.12.2021

Appellant present through counsel.


Muhammad Adeel Butt, learned Additional Advocate General for respondents present. Arguments heard and record perused.

Vide our judgment of today of this Tribunal placed on file, the appeal at hand is accepted. Consequently, the impugned order of imposition of penalty with disciplinary proceedings wherefrom it resulted, are set aside and the appellant is reinstated into service from the date of his dismissal from service with all back benefits. The concerned respondent on receipt of the copy of this judgment shall issue the order of appellant's reinstatement with all back benefits having accrued or accruable from the date of his dismissal from service. With no order as to costs. File be consigned to the record room.

Announced.  
02.12.2021



(Atiq ur Rehman Wazir)  
Member (E)

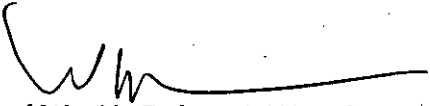


(Rozina Rehman)  
Member (J)

25.03.2021

Junior to counsel for the appellant present. Mr. Kabirullah Khattak learned Addl. AG alongwith Arif Saleem Stenographer for respondents present.

Representative of respondents submitted reply/comments which is placed on file. To come up for rejoinder if any, and arguments on 26.07.2021 before D.B.

  
(Atiq Ur Rehman Wazir)  
Member (E)

26.07.2021

Junior to counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Former made a request for adjournment as senior counsel is busy before District Courts Kohat. Request is accorded. To come up for arguments on 14.09.2021 before D.B.

  
(Rozina Rehman)  
Member (J)

  
Chairman

14.09.2021

Appellant present through counsel.

Muhammad Adeel Butt learned Additional A.G for respondents present.

Former submitted rejoinder with a request for adjournment. Request is acceded. To come up for arguments on 22.10.2021 before D.B.

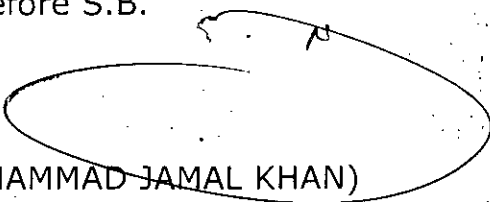
  
(Rozina Rehman)  
Member (J)

  
Chairman

01.12.2020

Junior counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is also present.

Written reply on behalf of respondents not submitted. Learned Additional Advocate General is directed to ensure presence of representative of the department and submit reply on the next date. Adjourned to 04.01.2021 on which date file to come up for written reply/comments before S.B.

  
(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

04.01.2021

Junior to counsel for the appellant and Addl. AG alongwith Arif Saleem Steno for the respondents present.

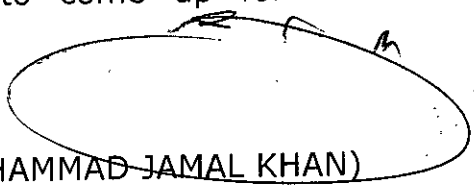
Representative of the respondents seeks time to furnish reply/comments. Adjourned to 29.01.2021 on which date the requisite reply/comments shall be positively submitted.

  
Chairman

29.01.2021

Junior to the senior for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Arif Saleem, Steno, for the respondents are also present.

Written reply on behalf of respondents not submitted. Representatives of the department are seeking further time for submission of written reply/comments. Last chance is given to the respondents for filing of written reply/comments. Adjourned to 25.03.2021 on which date file to come up for written reply/comments before S.B.

  
(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

06.08.2020

Syed Mudassir Pirzada, Advocate for appellant is present.

Appellant was proceeded departmentally of having involvement in the commission of certain offences by having telephonic contact with the outlaws whereas no where he has been nominated in the FIR nor the inquiry officer in his detail report has attributed any role to him nor the complainant has charged him of having any role in the commission of offence but even then he was charge sheeted and awarded major punishment of dismissal from service.

The points so agitated require consideration in the light of the law and rules in vogue, therefore, the appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within ten days, thereafter, notices be issued to the respondents for written reply/comments. File to come up for written reply/comments on 06.10.2020 before S.B.

Appellant Deposited  
Security & Process Fee

6/8/20

06.10.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

Learned AAG seeks time. He is required to contact the respondents and facilitate the submission of requisite reply/comments on next date positively.

Adjourned to 01.12.2020 before S.B.

Chairman





BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal 3326 2020

Abdul Wahab No-50 Ex-Constable Gunner District Police Kohat

(Appellant)

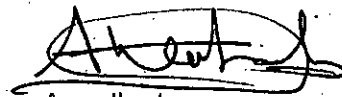
VERSUS

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

Date 24/4/20

  
Syed Mudasir Pirzada  
Advocate HC  
0345-9645854

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Abdul Wahab No-50 Ex-Constable Gunner District Police Kohat.

(Appellant)

**Khyber Pakhtukhwa  
Service Tribunal**

VERSUS

Diary No. 2654

1. INSPECTOR GENERAL OF KPK POLICE PESHAWAR.

2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT

Dated 24/04/2020

3. DISTRICT POLICE OFFICER KOHAT.

(Respondent)

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 16-01-2020 VIDE OB-NO 34 IN WHICH THE RESPONDENT NO:-3 WITHOUT ANY PROPER ENQUIRY DIRECTLY AWARD THE MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE WITH IMMEDIATE EFFECT AND THE APPELLANT PREFERRED DEPARTMENTAL REPRESENTATION DATED 20-01-2020 BUT THE SAME WAS NOT CONSIDER NOR ENTERTAIN TILL TO DATE**

Respectfully Sheweth,

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

Facts:

I:-Briefly facts as per impugned order are that on 03-12-2019 complainant of case FIR No-1593 dated 05-12-2019 U/S 365 PPC PS City reported regarding taking of her /his son by a person in Police uniform .

II:-As contemplated from report of SP Investigation Kohat ,the appellant had telephonically contact with charged accused before and after the occurrence which shows professional misconduct.(Copy of Impugned order is annexed as annexure A)

That appellant was served with the charge sheet along with statement of allegation and the appellant had properly submitted his reply which was deliberately not consider nor discussed in impugned order as well as issued the Final Show Cause notice and then an ex-partly proceeding were conducted against the appellant.(Copy of charge Sheet with reply and FCN is annexed as annexure B)

That there is nothing is on the record which connect the appellant with the allegation nor proved and the appellant is blessed with impugned punishment which not warranted by law.

That an unjust has been done with the appellant by not giving ample opportunity of cross examination as well as not heard in person nor properly enquired the allegation and ex-partly proceedings conducted against the appellant without

Filed-to-day  
Registrar  
24/04/2020

probing held guilty the appellant without following the prescribed rules relating to enquiry proceedings as per Police Rules 1975 (amended 2014).

That nothing has been proved beyond any shadow of doubt that the appellant has committed any misconduct or tarnished/damaged the image of Police department.

That the complainant had also record his statement in the court of law in which the appellant has been declare as innocent having no concern with the commission of offence as well as in so called departmental enquiry proceedings also exonerated the appellant by complainant while conducting identification parade but this fact was also not consider by enquiry officer and only on the basis of CDR the appellant has been consider guilty and blessed with impugned order without keeping in mind the Judgment of Superior Courts that only on the basis of Mobile data etc no one should be punished.

That the appellant being a subordinate junior officer werè duty bound to obey all the lawful orders of senior officer and never ever indulge in any subversive activities which were not warranted by law only on the basis of presumption the appellant has been held guilty by enquiry officer more over the allegations which are not proved against the appellant at any forum till to date but without any cogent reason the appellant has been blessed with the impugned order which is against the rules *ibid*.

That there are numerous good entries in the service record of the appellant which could be verified but this fact has not been taken in consideration while awarding the major punishment which is against to the canon of justice.

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.

That the appellant feeling aggrieved from the impugned order prefer departmental representation which was not consider nor entertain till to date (Copy of departmental representation annexed as annexure C)

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

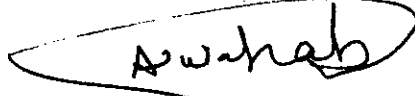
That while awarding the impugned major punishment the enquiry report has not been given to the appellant which is very much necessary as per 1991 PLC CS 706 & PLC 1991 584.

Grounds:

- a. That no proper enquiry has been conducted none from the general public was examined in support of the charges leveled against the appellant. No allegation mentioned above are practiced by the appellant nor proved against any cogent reason against the appellant.
- b. That the appellant was neither intimated nor informed by any source of medium regarding enquiry proceedings for any disciplinary action which shows bias on the part of respondents above even though the statement of the complainant which was tender by complainant was also not consider regarding the actual crux but in vain
- c. That the appellant was not heard in person nor called in orderly room and also not mentioned in the impugned order that the appellant was called because the when the expertly proceedings were conducted then how could it possible that the appellant was heard and called for orderly room which does not appeal to a prudent mind .
- d. That as per the contents of allegation mentioned in FCN and in departmental proceedings are different with each other.
- e. That it is not ascertainable that what element had promoted the competent authority to award punishment to the appellant in hasty manner.
- f. That as per the constitution of Islamic Republic Of Pakistan clearly speaks about the fundamental rights that the fair and transparent enquiry is the right of any employee.
- g. That the punishment is harsh in nature and the appellant is vexed for undone offence which is against the constitution of Islamic republic of Pakistan 1973.
- h. That the appellant is honest and dedicated one and leave no stone unturned to discharge his duties.
- i. That as per universal declaration of human rights 1948 prohibits the arbitral / discretion.
- j. That the Respondent No-3 has acted whimsically and arbitrary, which is apparent from the impugned order.
- k. That the impugned order is not based on sound reasons and same is not sustainable in the eyes of law. The same is based on wrong assumption of facts.
- l. That the departmental enquiry was not conducted according to the rules.
- m. That the impugned order is outcome of surmises and conjecture.


Pray

In the view of above circumstances it is humbly prayed that the impugned order of Respondent No-3 dated 16-01-2020 Kohat may please be set aside for the end of justice and the appellant may please be graciously re-instate in service with all back benefits.

  
Appellant

Date 24/4/20

Through

  
Syed Mudasir Pirzada  
Advocate HC Kohat  
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

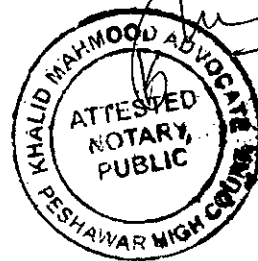
- 1:- Constitution of Pakistan 1973
- 2:- Police Rules
- 3:- Case Law according to need.


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



  
24-4-2020

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Abdul Wahab No-50 Ex-Constable Gunner 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)

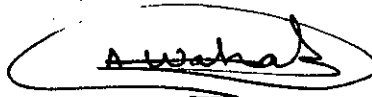
ADDRESS OF THE PARTIES

APPELLANT :-

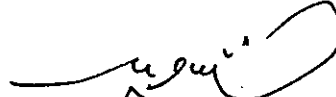
Abdul Wahab No-50 Ex-Constable Gunner District Police Kohat

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 24/4/20





OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT  
Tel: 0922-9260116 Fax 9260125

ORDER

*Ameeb*  
*P-8*

This order will dispose of departmental enquiry against constable Abdul Wahab No. 50 of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

- i. Facts arising of the case are that on 03.12.2019, complainant of case FIR No. 1593 dated 05.12.2019 U/S 365 PPC PS City, reported regarding taking of her/his son by a person in Police uniform.
- ii. As contemplated from report of SP Investigation Kohat, that constable Abdul Wahab No. 50 had telephonically contact with charged accused before and after occurrence, which shows professional gross misconduct on his part.

For the above, serious / professional misconduct of the accused constable (gunner). Charge sheet alongwith statement of allegations was served upon the accused constable. SP Operations Kohat was appointed as enquiry officer to scrutinize the conduct of the constable. The enquiry officer stated that the complainant party has patched up the matter with the accused for the reasons best known to him and in order to save the skin of accused official and other police official in the departmental proceedings. However, it has been established that the defaulter official and others are closed to the accused and involved / connivance with the commission of offence. However, irrespective of the statements of the complainant party and confirmation of bail before arrest of the accused, it has been established from CDR and investigation that the accused official and others were in contact with the accused before and after the commission of offence. The defaulter constable has earned a bad name to the entire department and caused damage to the image of Police. Therefore, the charges and allegations leveled against the defaulter official and others have been established beyond any shadow of doubt and recommended for a major punishment. He was further served with Final Show Cause Notice. Reply was received and found unsatisfactory.

In view of the available record, I agree with the findings of enquiry officer, therefore, in exercise of powers conferred upon me under the rules *ibid* I, Capt. ® Mansoor Aman, District Police Officer, Kohat is hereby award a major punishment of dismissal from service with immediate effect, kit etc be collected and report

Announced  
16.01.2020

*Attest*  
*[Signature]*

DISTRICT POLICE OFFICER,  
KOHAT *[Signature]*

OB No. 34

Dated 16-01-2020

No. 197-99 IPA dated Kohat the 16-1-2020

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

1. Regional Police Officer, Kohat please
2. R.I/Reader/Pay officer/SRC/OHC for necessary action.

DISTRICT POLICE OFFICER,  
KOHAT *[Signature]*

*17-01-2020*  
*جیک*  
*لائسنس*  
*وکی*  
*صفا جسٹس*



No 59027-28/PA

Office of the  
District Police Officer,  
Kohat

Dated 27-12/2019

9

**CHARGE SHEET**

I, **CAPT ® MASNOOR AMAN, DISTRICT POLICE OFFICER, KOHAT**, as competent authority under Khyber Pakhtunkhwa Police Rules (amendments 2014) 1975, am of the opinion that you **Constable Abdul Wahab No. 50 PS Cantt** rendered yourself liable to be proceeded against, as you have committed the following act/omissions within the meaning of Rule 3 of the Police Rules 1975.

- i. **On 03.12.2019, complainant of case FIR No. 1593 dated 05.12.2019 U/S 365 PPC PS City, reported regarding taking of her/his son by a person in Police uniform.**
- ii. **As contemplated from report of SP Investigation Kohat, that you constable Abdul Wahab had telephonically contact with charged accused before and after occurrence, which shows professional gross misconduct on your part.**

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

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 defense to put in and ex-parte action shall be taken against you.

4. A statement of allegation is enclosed.

Received by:

DISTRICT POLICE OFFICER,  
KOHAT

27/12



No. 59027-28/PA

Office of the  
District Police Officer,  
Kohat

Dated 27-12-2019

10

**DISCIPLINARY ACTION**

I, **CAPT @ MANSOOR AMAN, DISTRICT POLICE OFFICER, KOHAT** as competent authority, am of the opinion that you **Constable Abdul Wahab No. 50 PS Cantt** have rendered yourself liable to be proceeded against departmentally under Khyber Pakhtunkhwa Police Rule 1975 (Amendment 2014) as you have committed the following acts/omissions.

**STATEMENT OF ALLEGATIONS**

- i. **On 03.12.2019, complainant of case FIR No. 1593 dated 05.12.2019 U/S 365 PPC PS City, reported regarding taking of her/his son by a person in Police uniform.**
- ii. **As contemplated from report of SP Investigation Kohat, that you constable Abdul Wahab had telephonically contact with charged accused before and after occurrence, which shows professional gross misconduct on your part.**

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

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

**DISTRICT POLICE OFFICER,  
KOHAT**

No. 59027-28/PA, dated 27-12-2019.

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

بحوالہ چارج شیٹ نمبر 28/PA-59027 مورخہ 27.12.2019 ذیل جواب عرض ہے۔

1- یہ کہ مقدمہ بحوالہ مقدمہ علت 1593 مورخہ 15.12.2019 جرم PPC 365 تھانہ سٹی کے ساتھ میرا کوئی واسطہ یا تعلق نہیں ہے اور نہ ہی وقوعہ میں میرا ملوث ہونے کا کوئی ثبوت ہے اسی طرح مدعی مقدمہ نے اپنی رپورٹ یا دوران تفتیش نہ میرا نام لیا ہے اور نہ ہی کسی بھی طرح ملوث یا ملزمان سے رابطے کے متعلق کوئی بیان دیا ہے۔

2- یہ کہ بحوالہ ٹیلی فونک رابطہ از بسلسلہ وقوعہ ملزمان غلط اور من گھڑت ہے۔ ایس پی انوسٹی گیشن صاحب نے سراسر یکطرفہ رپورٹ پیش کی ہے جو کسی غلط فہمی پر مبنی ہے جہاں تک ایس پی انوسٹی گیشن کی رپورٹ میں CDR بابت رابطہ ملزمان کا تعلق ہے میں اس پر معروض ہوں کہ میں تھانہ سٹی میں SHO صاحب کے ساتھ گنر رہا ہوں اور ملزمان کو ذاتی طور پر جانتا ہوں۔ ان کے ساتھ SHO صاحب کے کام کے سلسلے میں رابطہ ہوا تھا نیز وقوعہ کے بارے میں مجھے کوئی علم نہیں تھا جو کہ اس رابطہ کو ایس پی انوسٹی گیشن صاحب نے اپنی رپورٹ میں غلط فہمی کی بناء پر وقوعہ کے متعلق ملزمان سے رابطہ بیان کیا ہے۔ جو حقیقت کے برعکس ہے۔

جناب عالی!

استدعا ہے کہ میں ایک ذمہ دار پولیس کنشیل ہوں اپنے اور محکمہ کی عزت کی خاطر اس قسم کی من گھڑت سازش یا سنگین جرم میں ملوث ہونے کا سوچ بھی نہیں سکتا۔ با جواب چارج شیٹ بالا مجھے بے گناہ تصور کیا جا کر انکو ازری سے بری الذمہ قرار دیا جائے۔

Attest

کنشیل عبدالوہاب نمبر 50

AR





OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT

Tel: 0922-9260116 Fax 9260125

No. 190 /PA dated Kohat the 15/1 /2020

12

**FINAL SHOW CAUSE NOTICE**

1. I, **Capt. ® Mansoor Aman, District Police Officer, Kohat** as competent authority, under the Khyber Pakhtunkhwa Police Rules 1975, (amended 2014) is hereby serve you, **Constable Abdul Wahab No. 50** as follow:-

- i. That consequent upon the completion of inquiry conducted against you by the inquiry officer for which you were given opportunity of hearing vide office No. 59027-28/PA dated 27.12.2019.
  - ii. On going, through the finding and recommendations of the inquiry officer, the material on record and other connected papers including your defense before the inquiry officer.
- I am satisfied that you have committed the following acts/omissions, specified in section 3 of the said ordinance.

- a. **On 03.12.2019, complainant of case FIR No. 1593 dated 05.12.2019 U/S 365 PPC PS City, reported regarding taking of her/his son by a person in Police uniform.**
- b. **As contemplated from report of SP Investigation Kohat, that you constable Abdul Wahab No. 50 had telephonically contact with charged accused before and after occurrence, which shows professional gross misconduct on your part.**

2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you major penalty provided under the Rules **ibid.**

3. 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.

4. If no reply to this notice is received within 07 days of its delivery in the normal course of circumstances, it shall be presumed that you have no defence to put in and in that case as ex-parte action shall be taken against you.

5. The copy of the finding of inquiry officer is enclosed.

AR  
12/10

DISTRICT POLICE OFFICER,  
KOHAT

صاحب عالی!

13

کوالہ ٹائل ٹریڈرز گزٹ نمبر 190/19

حصہ 15 1/2 سے پہلے کی گزٹوں کے لیے

میں سے پہلے کے گزٹوں میں سے کسی ایک گزٹ کو

دیکھ کر - وہی گزٹ یا گزٹوں - اس میں گزٹوں

پر عمل نہیں کرنا چاہیے - یہی گزٹ یا گزٹوں

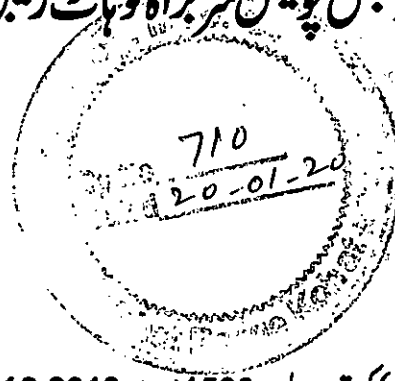
گزٹوں کی بیان ہے

پیش کردہ گزٹوں 50 سالوں کے لیے

APD

Attest

بخدمت جناب ریجنل پولیس سربراہ کوہاٹ ریجن



عنوان :- اپیل برائے بحالی سروس

جناب عالی

معروض خدمت ہوں کہ:-

- 1- عبدالواہاب سابقہ کانسٹیبل (گنر ایس ایچ او چھاؤنی) کو مقدمہ علت 1593 مورخہ 15.01.2019 جرم 365PP تھانہ سٹی کو ضلعی پولیس سربراہ کوہاٹ نے چارج شیٹ دے کر انکواری آفیسر ایس پی آپریشن کو مقرر کر کے انکواری آفیسر کے روبرو چارج شیٹ نمبر 197-99/PA کا تحریری جواب دیا گیا۔ اپنے آپ کو مقدمہ سے لائق اور بے گناہ بیان کیا کیونکہ حقیقت میں میں بے گناہ ہیں۔
- 2- مقدمہ میں تفتیشی آفیسر انور شاہ SI/OII تھانہ سٹی نے انکواری آفیسر کے روبرو تحریری بیان جمع کر کے مذکورہ نے اپنے بیان میں واضح طور پر کہا کہ اس نے مغوی اور مدعیہ کو آیت اللہ ایس ایچ او کا زیر استعمال VITS موٹر کار بمقام MT لائن میں دیکھلا کر مغوی نے اسرار کیا کہ اس کو گاڑی میں چکر دیں تب گاڑی کی شناخت کر سکے گا جس پر OII مذکورہ نے مغوی اور مدعیہ دونوں کو باوجودگی دیگر پولیس نفری گاڑی میں بیٹھا کر پٹا اور بائی پاس روڈ OTS روڈ تک VITS گاڑی میں پھیرا گیا۔ MT واپس آ کر مغوی نے بتلایا کہ یہ وہی گاڑی نہیں ہے جس میں اسکو گھر سے اغواء کر کے اٹھا کر لے گئے تھے۔ بیان جمع کرنے کے بعد تفتیشی افسر پر انکواری آفیسر نے کراس سوالات کئے کہ آیت اللہ اور گنر مقدمہ میں ملوث ہیں یا نہیں۔ جواب دے کر کہا کہ اس نے شروع سے لیکر آخر تک مقدمہ کی تفتیش کی ہے پولیس پارٹی کو تفتیش سے ملزمان نہ ہونا ظاہر کیا۔
- 3- انکواری آفیسر کے روبرو مغوی محمد علی، مغوی کی والدہ مسماۃ فاطمہ گل اور مغوی کے والد اسرار خان نے پیش ہو کر تحریری بیانات دیئے ہیں جس پر انکواری آفیسر نے کراس سوالات کئے کہ یہ تینوں پولیس اہلکاران جو آپ کے سامنے ہیں کیا انہوں نے آپ کو اٹھا کر اغواء کیا تھا جواب مغوی اور مدعیہ نے کہا کہ یہ پولیس اہلکاران نہیں ہیں اور جنہوں نے اغوائگی کی ہے ان اہلکاران کو سامنے آنے پر پہچان کر سکتی ہوں۔
- 4- ملزم فرہاد بخش کا بیان انکواری آفیسر نے لیکر جس پر کراس سوالات کر کے جواب میں کہا کہ اسکا کئی ایس ایچ او کے ساتھ تعلق ہے جسکے نام لئے ہیں اور یہ بھی کہا کہ وہ پولیس کو انفارمیشن فراہم کرتا ہے۔

جناب والا!

کسی بھی انکواری مقدمہ کی اصلیت اور حقیقت کے دواہم جز ہوتے ہیں جو فیصلہ پر اثر انداز ہوتے ہیں۔

i- تفتیشی کارروائی

ii- مدعی مغوی سے شناخت پریڈ

- تفتیشی آفیسر کے بیان اور تفتیش کے مطابق ہم پولیس اس مقدمہ سے مبرا ہیں کیونکہ ایس ایچ او صاحب کی زیر استعمال VITS گاڑی کو مغوی اور مدعیہ سے دوران تفتیش شناخت پریڈ کرائی گئی ہے جو عدم شناخت بیان ہوئی ہے۔
- 2- مغوی اور مدعیہ سے دوران انکواری بذات خود انکواری آفیسر نے ہم پولیس نفری کا اپنے دفتر میں روبرو شناخت پریڈ کرا کر بقول مدعی اور مغوی ہم وہ پولیس اہلکاران نہ نکلے جنہوں نے وقوع کے دوران پولیس کی وردی پہنچی تھی۔
- 3- چارج شیٹ جمع کرانے پر انکواری آفیسر نے میرے اوپر کسی قسم کے کراس سوالات نہیں کئے۔ فائل شوکاڈ نوٹس اسی دن جاری کیا جس سے مجھے سروس سے برخاست کیا۔

نوٹ:- نہ ہی مجھے اردنی روم میں پیش کر کے صفائی کا موقع دیا گیا ہے جو کہ انصاف کے تقاضوں کے برعکس ہے۔

- 4- ایسے ملزمان جو پولیس نے مقدمہ میں خود چارج کئے اور ان ملزمان کے حق میں مدعی فریق نے عدالت میں بیان ریکارڈ کر کے ملزمان کی عبوری ضمانت کنفرم ہوئی ہے اگر نامزد ملزمان کا تصور نہیں تو مجھے صرف نامزد ملزمان کے ساتھ رابطہ کی وجہ سے سزا دی گئی ہے جو درست فیصلہ نہیں ہے ایسے میں نامزد ملزمان کے ساتھ موبائل رابطہ محکمہ پولیس کو انفارمیشن کے تعلق پر مبنی ہیں تاکہ مجرمانہ سوچ پر رابطے کئے ہیں۔

باوجود اسکے کہ سن عبدالواہاب کے خلاف دوران انکوائری کوئی بھی ثبوت نہ ملا کیونکہ میں بے گناہ ہوں لیکن انکوائری آفیسر نے بالا آفیسر کو  
Major Punishment کا لکھ جس میں مجھے محکمہ پولیس سے درخواست کیا جو میں رد کرتا ہوں کیونکہ انکوائری میں ظاہر ہونے والے حقیقت کو  
نظر انداز کر کے منصفانہ فیصلہ نہیں کیا گیا ہے میں اس فیصلے کو اعدہ فیصلہ قرار دیتا ہوں جو کہ میرا قانونی حق ہے۔

استدعا ہے کہ مندرجہ بالا حالات کو پیش نظر رکھتے ہوئے سائل کی اپیل کو منظور فرما کر محکمہ پولیس میں نوکری پر بحال کیا جائے۔

(حیدر کاغذ اس مشورہ لکھیے)  
تحریر 20.01.2020

العارض  
aecheek  
عبدالواہاب سابقہ کاغذیل کوہاٹ

1276 16e dt. 22-01-20  
DPO Kohat

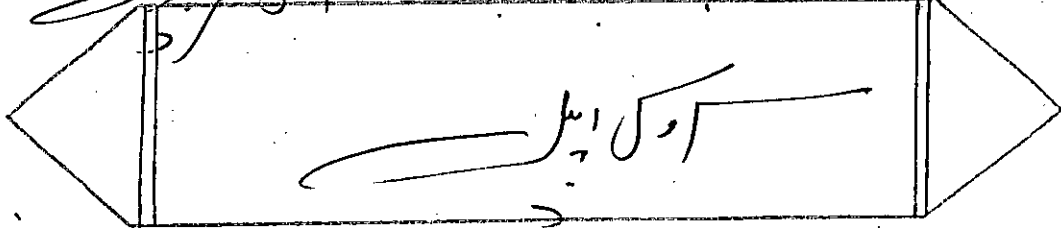
EC  
2011

For comments, enquiry file  
& Service documents please.

DIG POLICE  
KOHAT  
20/1/20



بعد التضرار کے لیے ایک اکوٹریٹو نوٹ لکھنا اور



ص 2020ء منجانب ایسٹریٹ  
بنام  
1GP- etc

عسر الوداع

موزخ  
مقدمہ  
دعویٰ  
جرم

### باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ  
آن مقام لنار کیلئے سید صاحب سجادہ اللہ علیہ  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ یا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو کبھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم 24 ماہ اپریل 2020

کے لئے منظور ہے۔  
Accepted  
مقام لنار

مقام لنار  
S. A. A. A. A.

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

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Service Appeal No. 3326/2020

Abdul Wahab Ex-Constable No. 50

..... Appellant

**VERSUS**

Inspector General of Police,  
Khyber Pakhtunkhwa & others

..... Respondents

**PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1 TO 3**

**Respectively Sheweth:-**

**Preliminary Objections:-**

- i. That the appellant has got no cause of action.
- ii. That the appellant has got no locus standi.
- iii. That the appeal is not maintainable in its present form.
- iv. That the appeal is bad in law and not maintainable as the appellant has not questioned the order of respondent No. 2 vide which the departmental appeal of the appellant was rejected.
- v. That the appellant is estopped to file the instant appeal for his own act.
- vi. That the appellant has not approached the honorable Tribunal with clean hands.
- vii. That the appeal is bad for misjoinder and non-joinder of necessary parties.
- viii. That the appeal of the appellant is badly time barred.

**Facts:-**

1. One Mst: Fatima Gul Bibi w/r Israr Khan r/o Mohallah Mian Badshah Kohat reported to local Police on 3<sup>rd</sup> December-2019 that one the eventful day at 16:30 hrs her house door was knocked. She opened the door and witnessed that one person wearing Police uniform and face mask, who asked about any male of her family. She informed her son named Ali Israr, who went out and the aforesaid person took away him in a motorcar in context of search of his house. She reported for search of her son, upon which an investigation u/s 156 (iii) CrPC was initiated. The investigation culminated in registration of FIR vide No. 1593 dated 05.12.2019 u/s 365 PPC PS City Kohat. Copy is **annexure A.**

During course of investigation of the case. SP investigation vide his report dated 24.12.2019 submitted that SHO Ayat Ullah (now dismissed in the said incident) and his gunners named constable Abdul Wahab (present appellant) and Muhammad Abid were constantly in contact with the accused subsequently charged in the case. In this regard SP investigation obtained CDR of the accused, which established the telephonic contact of appellant and others with accused of the aforesaid criminal case. Copy of report is **annexure B**.

On the involvement of appellant in a heinous crime and pursuant to the report of SP Investigation, Kohat, the respondent No. 3 initiated departmental proceedings against the appellant under the relevant rules. During course of inquiry proceedings, the appellant was held guilty of the charge. Therefore, on completion of all codal formalities the appellant was awarded punishment commensurate to the charges by the respondent No. 3. Copy of inquiry report is **annexure C**.

As contemplated from the report of SP investigation, Kohat the appellant was served with charge sheet with statement of allegation and a regular inquiry was initiated against the appellant. The inquiry officer filed his report and held him guilty of the charges, upon which the appellant was served with final show cause notice. Hence, a regular inquiry was conducted against the appellant and he was associated with the inquiry proceedings, hence, question of ex-parte does not arise / establish. Copy of final show cause notice with signature of receipt of appellant is **annexure D**.

Incorrect, the charges / allegations leveled against the appellant were established beyond any shadow of doubt.

Incorrect, a regular inquiry was conducted, the appellant was associated with the proceedings and afforded ample opportunity of defense, but failed to submit any plausible explanation / reply to his criminal act / misconduct.

Incorrect, the charges / allegations leveled against the appellant during the departmental inquiry were established beyond any shadow of doubt.

Irrelevant, criminal and departmental proceedings are different in nature. The conduct of the appellant was established technically and from the evidence placed on inquiry file.

The appellant has admitted his guilt in this para of the memorandum of appeal as telephonically contact with the criminals charge in the aforesaid case.

Incorrect, reward and punishment in a disciplined department runs side by side and the appellant cannot take benefit of his good entry if any. Furthermore, the appellant was proceeded with departmentally for his gross professional misconduct.

Incorrect, reply is submitted in the above paras.

The departmental appeal of the appellant was processed by respondent No. 2, accordingly, found devoid of merits and rejected vide order dated 25.06.2020 which is not questioned by the appellant. Copy is **annexure E**.

Incorrect, the appellant was proceeded with departmentally by respondent No. 3 for his own serious criminal act. Furthermore, the case law referred by the appellant is not relevant to the instant appeal.

Incorrect, all codal formalities were fulfilled by the respondent during the entire departmental proceedings.

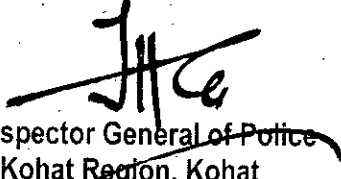
**Grounds:-**


- a. Incorrect, a regular departmental inquiry was conducted against the appellant in accordance with the rules. There was sufficient documentary / technical evidence against the appellant i.e CDR and charges were established against appellant during departmental probe.
- b. Incorrect, the appellant was properly served with charge sheet / statement of allegations, final show cause notice and associated with the proceedings. The material / evidence collected during the proceedings were considered, which connected the appellant with the commission of gross professional misconduct, in addition to commission of criminal act.
- c. Incorrect, the appellant was associated with the proceedings and heard in person but fail to submit any plausible explanation.
- d. Incorrect, a legal and speaking order based on the charges / allegations and evidence was passed by the respondent No. 3 being competent authority under the rules.
- e. Incorrect, the departmental proceedings were conducted against the appellant on the basis of findings report of SP investigation Kohat wherein the telephonic contact of the appellant with accused was ascertained through CDR collected in investigation of criminal case. Copy of report of I.O is **annexure F**.
- f. Incorrect, no constitutional / fundamental right of the appellant was violated as he being member of a disciplined department was proceeded with departmentally for his misconduct under the relevant rules.
- g. Incorrect, the appellant was awarded appropriate punishment commensurate to the charges / allegations proved against him during departmental probe.
- h. Incorrect, the appellant has indifferent service record. The act committed by the appellant damaged the image of entire disciplined Police department.

- i. Incorrect, the appellant was proceeded with departmentally under the relevant rules.
- j. Incorrect, para No. j of the memorandum of appeal is replication and reply has submitted in the above paras.
- k. Incorrect, a legal and speaking order is passed in accordance with the facts and rules.
- l. Incorrect, all codal formalities have been fulfilled according to law & rules.
- m. Incorrect, all codal formalities have been fulfilled according to law & rules.

**Prayer:-**

In view of the above, it is prayed that the appeal being contrary to facts, law & rules and devoid of merits, may graciously be dismissed with costs.

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

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

  
District Police Officer,  
Kohat  
(Respondent No. 3)

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

---

Service Appeal No. 3326/2020  
Abdul Wahab Ex-Constable No. 50

..... Appellant

**VERSUS**

Inspector General of Police,  
Khyber Pakhtunkhwa & others

..... Respondents

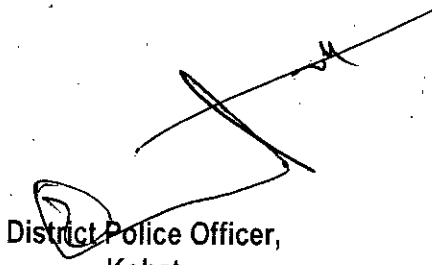
**COUNTER AFFIDAVIT**

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



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

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



District Police Officer,  
Kohat  
(Respondent No. 3)



OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA

PESHAWAR.

No. S/ 785 /21, dated Peshawar the 04/03 /2021.

**ORDER**

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by **Ex-FC Abdul Wahab No. 50**. The petitioner was dismissed from service by District Police Officer, Kohat vide OB No. 34, dated 16.01.2020 on the allegations that he while posted as GUNNER with SHO PS City, a case vide FIR No. 1593, dated 15.12.2019 u/s 365 PPC was registered in PS City. During course of investigation, SP Investigation, vide his report No. 6440/Reader, dated 24.12.2019 intimated that the SHO and his GUNNER/DRIVER had in contact with accused and his CDR was obtained in this regard. Complainants of the said FIR, reported regarding taking of his son by a person in Police uniform. It has also been reported that he had contact with the accused on the eventful day i.e. before and after the occurrence. His appeal was rejected by Regional Police Officer, Kohat vide order Endst: No. 6899/EC, dated 06.07.2020.

Meeting of Appellate Board was held on 14.01.2021 wherein petitioner was heard in person. Petitioner contended that accused involved in case FIR No. 1593, dated 15.12.2019 u/s 365 PPC PS City was acquitted by the court vide judgment dated 10.10.2020 on the basis of complainant's statement wherein she stated that she did not want to charge anyone for the commission of offence.

Perusal of enquiry papers reveals that the allegations against the petitioner have been proved from CDR and investigation. Therefore, the Board decided that his petition is hereby rejected.

Sd/-

**KASHIF ALAM, PSP**  
Additional Inspector General of Police,  
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. S/ 786-96 /21,

Copy of the above is forwarded to the:

1. Regional Police Officer, Kohat.
2. District Police Officer, Kohat.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
5. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV CPO Peshawar.

**(IRFAN ULHAH KHAN) PSP**  
AIG/Establishment,  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

ORDER.

This order will dispose of a departmental appeal, moved by Ex-Constable Abdul Wahab No. 50 of Kohat district against the punishment order, passed by DPO Kohat vide OB No. 34, dated 16.01.2020 whereby he was awarded major punishment of dismissal from service on the following allegations:-

“He while posted as GUNNER WITH SHO PS City, a case vide FIR No. 1593, dated 15.12.2019 u/s 365 PPC was registered in PS City. During course of investigation, SP Investigation vide his report No. 6440/Reader, dated 24.12.2019 intimated that the SHO and his GUNNERS had in contact with accused and his CDR was obtained in this regard. Complainants of the said FIR, reported regarding taking of their son by a person in Police uniform. It has also been reported that he had contact with the accused on the eventful day i.e. before and after the occurrence.”

He preferred an appeal to the undersigned upon which comments were obtained from DPO Kohat and his service documents were perused. He was also heard in person in Orderly Room, held on 25.06.2020. During hearing, he did not advance any plausible explanation in his defense to prove his innocence.

I have gone through the available record and came to the conclusion that the allegations leveled against the appellant are proved beyond any shadow of doubt and the same has also been established by the E.O in his findings. Therefore, his appeal being devoid of merits is hereby rejected.

Order Announced  
25.06.2020

3458  
8/7/20

*JH Ce*  
(TAYYAB HAFEEZ) PSP  
Region Police Officer,  
Kohat Region.

No. 6855 /EC, dated Kohat the 6/7 /2020.

Copy to DPO/Kohat for information w/r to his office Letter No. 1497/LB, dated 29.01.2020. His Service Roll & Fauji Missal / Enquiry File is returned herewith.

*SRC / JH Ce*  
*For n. action*

*JH Ce*  
(TAYYAB HAFEEZ) PSP  
Region Police Officer





OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT  
Tel: 0922-9260116 Fax 9260125

## ORDER

This order will dispose of departmental enquiry against constable Abdul Wahab No. 50 of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

- i. Facts arising of the case are that on 03.12.2019, complainant of case FIR No. 1593 dated 05.12.2019 U/S 365 PPC PS City, reported regarding taking of her/his son by a person in Police uniform.
- ii. As contemplated from report of SP Investigation Kohat, that constable Abdul Wahab No. 50 had telephonically contact with charged accused before and after occurrence, which shows professional gross misconduct on his part.

For the above, serious / professional misconduct of the accused constable (gunner). Charge sheet alongwith statement of allegations was served upon the accused constable. SP Operations Kohat was appointed as enquiry officer to scrutinize the conduct of the constable. The enquiry officer stated that the complainant party has patched up the matter with the accused for the reasons best known to him and in order to save the skin of accused official and other police official in the departmental proceedings. However, it has been established that the defaulter official and others are closed to the accused and involved / connivance with the commission of offence. However, irrespective of the statements of the complainant party and confirmation of bail before arrest of the accused, it has been established from CDR and investigation that the accused official and others were in contact with the accused before and after the commission of offence. The defaulter constable has earned a bad name to the entire department and caused damage to the image of Police. Therefore, the charges and allegations leveled against the defaulter official and others have been established beyond any shadow of doubt and recommended for a major punishment. He was further served with Final Show Cause Notice. Reply was received and found unsatisfactory.

In view of the available record, I agree with the findings of enquiry officer, therefore, in exercise of powers conferred upon me under the **rules ibid I**, Capt. @ Mansoor Aman, District Police Officer, Kohat is hereby award a **major punishment of dismissal from service** with immediate effect, kit etc be collected and report

**Announced**  
**16.01.2020**

DISTRICT POLICE OFFICER,  
KOHAT

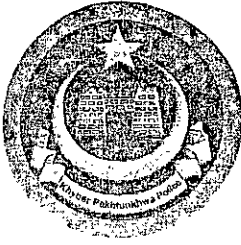
OB No. 34  
Dated 16-01-2020  
No. 197-99 /PA dated Kohat the 16-1-2020.

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

1. Regional Police Officer, Kohat please
2. R.I/Reader/Pay officer/SRC/OHC for necessary action.

DISTRICT POLICE OFFICER,  
KOHAT

Handwritten notes in Urdu:  
17-01-2020  
کاپی  
لائی  
وکی  
میں  
میں



**OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT**

Tel: 0922-9260116 Fax 9260125

No 190 /PA dated Kohat the 15/1 /2020

**FINAL SHOW CAUSE NOTICE**

1. I, **Capt. ® Mansoor Aman, District Police Officer, Kohat** as competent authority, under the Khyber Pakhtunkhwa Police Rules 1975, (amended 2014) is hereby serve you, **Constable Abdul Wahab No. 50** as follow:-

- i. That consequent upon the completion of inquiry conducted against you by the inquiry officer for which you were given opportunity of hearing vide office No. 59027-28/PA dated 27.12.2019.
- ii. On going, through the finding and recommendations of the inquiry officer, the material on record and other connected papers including your defense before the inquiry officer.

I am satisfied that you have committed the following acts/omissions, specified in section 3 of the said ordinance.

- a. **On 03.12.2019, complainant of case FIR No. 1593 dated 05.12.2019 U/S 365 PPC PS City, reported regarding taking of her/his son by a person in Police uniform.**
- b. **As contemplated from report of SP Investigation Kohat, that you constable Abdul Wahab No. 50 had telephonically contact with charged accused before and after occurrence, which shows professional gross misconduct on your part.**

2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you major penalty provided under the Rules **ibid.**

3. 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.

4. If no reply to this notice is received within 07 days of its delivery in the normal course of circumstances, it shall be presumed that you have no defence to put in and in that case as ex-parte action shall be taken against you.

5. The copy of the finding of inquiry officer is enclosed.

**DISTRICT POLICE OFFICER,  
KOHAT**

صباح عالی!

حوالہ مائل ٹیگور ٹیگور غیری 180/18

عصر 15 20 1/2 صبح 10 بجے تک جو

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دیئے۔ وہی میرا بیٹا ہے۔ اس میں کچھ لکھی

رہیں اس کو لکھا ہے۔ یہی میرا بیٹا ہے

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میں 50 سال لکھی ہیں جو

APDS

**DEPARTMENTAL ENQUIRY AGAINST CONSTABLE ABDUL WAHAB NO. 50**

Respected Sir,

It is submitted that I have been appointed as enquiry officer, in departmental proceedings initiated against constable Abdul Wahab No. 50.

Short facts of the case are that on 03.12.2019 at 17:00 hrs complainant Fatima Gul Bibi r/o Muhallah Mian Badshah Kohat City reported the local Police that at 16:30 hrs her house door was knocked, upon which she opened the door and found a person in Police uniform wearing mask. She informed her son named Muhammad Ali. In the meanwhile her son was taken away by persons wearing Police uniform in a vittz motorcar. In the meantime Israr Khan husband of the complainant unfolded that he has got dispute over landed property with one Farhad s/o Nasrullah r/o Ghari Dhodewal, who was not paying Rs. 95 lac as sale consideration of land and threatened for dire consequences. He suspects that his son was taken away by him in Police uniform. The report was entered in daily diary No. 36 dated 03.12.2019 and investigation u/s 156 (iii) CrPC was initiated. Later on the abductee name above appeared before the Police and stated that on the eventful day two person in Police uniform and two others in civvies have taken away in a white color motorcar and asked that SHO has called him. The victim was examined u/s 161 & 164 CrPC. The proceedings culminated into registration of FIR vide No. 1593 dated 05.12.2019 u/s 365 PPC PS City against three accused.

As reported by SP Investigation vide his office No. 4640/Reader dated 24.12.2019 that SHO Ayat Ullah and his gunners named constable Abdul Wahab and Muhammad Abid had made telephonically contact with the accused before and after the commission of offence. They were called and interrogated during the course of investigation. Their contact with accused was established through CDR.

On the above, charge sheet and statement of allegations was issued against the defaulter official on the below charges:-

- i. On 03.12.2019, complainant of case FIR No. 1593, dated 05.12.2019 u/s 365 PPC PS City, reported regarding taking of her/his son by a person in Police uniform.
- ii. As contemplated from report of SP Investigation Kohat, you constable Abdul Wahab had telephonically contacted with charged accused before and after occurrence, which show professional gross misconduct on your part.
- iii. It was also reported that you have also in contact with the accused on the eventful day i.e before and after the occurrence.

The charge sheet alongwith statement of the allegations was served upon the defaulter official, to which he submitted reply and deny the charge / allegations leveled against him.

In order to scrutinize the conduct of the accused official the following officials / witnesses were examined in presence of accused official.

1. SI Anwar Shah O.I.I
2. Israr Khan (husband of complainant) s/o Nisar Khan r/o Ghari Mawaz Khan.
3. Mst: Fatima Gul complainant,
4. Muhammad Ali abductee.
5. Farhad s/o Nasrullah accused.

Besides facts of the case and investigation the witness O.I.I stated that CDR of accused Farhad was obtained which transpired that the accused official and his driver constables named above remained in contact with accused on the eventful day. He further stated that the victim party was subjected for identification of motorcar and accused but they failed to identify the accused and a motorcar used in the commission of offence.

It is pertinent to mention that all the charge accused have succeeded to secure bail before arrest on the basis of affidavit submitted by victims before the court.

From the above and available record, I have reached to the conclusion that the complainant party has patched up the matter with the accused for the reasons best known to him and in order to save the skin of accused official and SI Ayat Ullah and other accused constable in the departmental proceedings. However, it has been established that the defaulter official, constable Muhammad Abid, co-accused and SI Ayat Ullah the then SHO are closed to the accused and involved in the commission of offence. However, irrespective of the statements of the complainant party and confirmation of bail before arrest of the accused, it has been established from CDR and investigation that the accused official and others were in contact with the accused before and after the commission of offence. The defaulter and other officials have earned a bad name to the entire department and caused damage to the image of Police. Therefore, the charges and allegations leveled against the defaulter official constable Abdul Wahab No. 50 have been established beyond any shadow. Hence, the defaulter official is recommended for a major punishment provided under Khyber Pakhtunkhwa, Police Rules 1975 (Amended 2014).

Submitted please.

W/DPO Kohat

  
SP Operations, Kohat  
(Enquiry Officer)

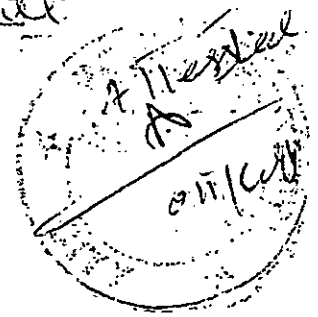


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1-1-19





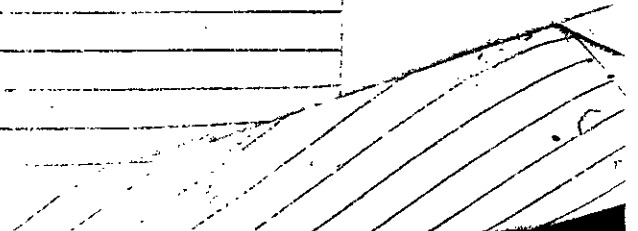
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| 923339999797 | Garhi Muwaz Khan - KOHAT      | 2019-12-03 17:35:09.0 | VOICE INCOMING | Garhi Muwaz Khan - KOHAT      | SHo Cantt                 |
| 923339999797 | Garhi Muwaz Khan - KOHAT      | 2019-12-03 17:35:46.0 | VOICE OUTGOING | Garhi Muwaz Khan - KOHAT      | Shahzada                  |
| 923339999797 |                               | 2019-12-03 18:01:53.0 | VOICE INCOMING |                               | Wahab Gunner SHo Cantt    |
| 923339999797 |                               | 2019-12-03 18:01:57.0 | VOICE INCOMING |                               | Rauf - DSB                |
| 923339999797 |                               | 2019-12-03 18:15:15.0 | VOICE INCOMING |                               | Wahab Gunner SHo Cantt    |
| 923339999797 | Bohmarat - BATELAG - KOHAT    | 2019-12-03 18:33:30.0 | VOICE INCOMING | Bohmarat - BATELAG - KOHAT    | SHo Cantt                 |
| 923339999797 |                               | 2019-12-03 18:42:18.0 | VOICE OUTGOING |                               | Wahab Gunner SHo Cantt    |
| 923339999797 |                               | 2019-12-03 18:44:02.0 | VOICE OUTGOING |                               | Minhaj                    |
| 923339999797 |                               | 2019-12-03 19:48:15.0 | VOICE OUTGOING |                               | Qazafi                    |
| 923339999797 |                               | 2019-12-03 19:58:00.0 | VOICE OUTGOING |                               | Missha boy Father - 15750 |

Handwritten notes and signatures on the right side of the page, including "Qazafi", "Shahzada", "SHo Cantt", and "Missha boy Father - 15750".

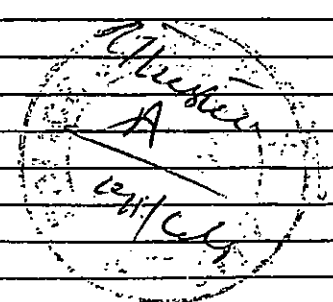


| SR NUMBER       | SR NUMBER    | SR NUMBER    | CALL START TIME       | DURATION | CALL TYPE      | LOCATION                           |
|-----------------|--------------|--------------|-----------------------|----------|----------------|------------------------------------|
| 354874102008620 | 923339999797 | 923337557557 | 2019-12-02 16:45:32.0 | 0        | SMS OUTGOING   | Nakband - KOHAT                    |
| 354874102008620 | 923339999797 | 923337557557 | 2019-12-02 16:49:07.0 | 0        | SMS INCOMING   | Nakband - KOHAT                    |
| 354874102008620 | 923339999797 | 923335556550 | 2019-12-02 17:25:48.0 | 33       | VOICE INCOMING |                                    |
| 354874102008620 | 923339999797 | 923335556550 | 2019-12-02 17:28:01.0 | 28       | VOICE OUTGOING |                                    |
| 354874102008620 | 923339999797 | 923335556550 | 2019-12-02 17:29:13.0 | 56       | VOICE INCOMING | Togr Bala - KOHAT                  |
| 354874102008620 | 923339999797 | 923335556550 | 2019-12-02 17:34:32.0 | 63       | VOICE OUTGOING | Togr Bala - KOHAT                  |
| 354874102008620 | 923339999797 | 923348093577 | 2019-12-02 17:38:51.0 | 84       | VOICE OUTGOING | Mujeeb abad - KOHAT                |
| 354874102008620 | 923339999797 | 923348093577 | 2019-12-02 17:40:24.0 | 158      | VOICE OUTGOING | Behzadi Chiker kot. - KOHAT        |
| 354874102008620 | 923339999797 | 923355556550 | 2019-12-02 17:46:03.0 | 32       | VOICE OUTGOING | Station Headquarters Kohat - KOHAT |
| 354874102008620 | 923339999797 | 923355556550 | 2019-12-02 17:53:16.0 | 11       | VOICE INCOMING | Garhi Muwaz Khan - KOHAT           |
| 354874102008620 | 923339999797 | 923337557557 | 2019-12-02 17:54:07.0 | 36       | VOICE OUTGOING | Garhi Muwaz Khan - KOHAT           |
| 354874102008620 | 923339999797 | 923336666868 | 2019-12-02 18:14:33.0 | 19       | VOICE OUTGOING | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923336666868 | 2019-12-02 18:20:30.0 | 23       | VOICE INCOMING | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923336666868 | 2019-12-02 18:23:05.0 | 23       | VOICE INCOMING | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923336666868 | 2019-12-02 18:25:22.0 | 6        | VOICE OUTGOING | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923339634123 | 2019-12-02 18:37:14.0 | 26       | VOICE INCOMING | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923355556550 | 2019-12-07 18:41:29.0 | 89       | VOICE OUTGOING | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923368863183 | 2019-12-02 18:43:41.0 | 24       | VOICE OUTGOING | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923336666868 | 2019-12-02 19:59:22.0 | 23       | VOICE OUTGOING | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923339634123 | 2019-12-03 12:24:51.0 | 0        | SMS INCOMING   | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923336666868 | 2019-12-03 12:34:50.0 | 29       | VOICE OUTGOING | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923336666868 | 2019-12-03 12:35:45.0 | 47       | VOICE OUTGOING | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923355556550 | 2019-12-03 12:41:57.0 | 73       | VOICE OUTGOING | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923348093577 | 2019-12-03 12:45:03.0 | 0        | SMS INCOMING   | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923355556550 | 2019-12-03 12:46:27.0 | 0        | SMS INCOMING   | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923365672998 | 2019-12-03 12:47:26.0 | 0        | SMS INCOMING   | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923138561440 | 2019-12-03 13:02:04.0 | 115      | VOICE OUTGOING | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923339634123 | 2019-12-03 13:04:00.0 | 14       | VOICE INCOMING | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923368863183 | 2019-12-03 13:08:03.0 | 35       | VOICE OUTGOING | Usmania Colony - KOHAT             |
| 354874102008620 | 923339999797 | 923340538329 | 2019-12-03 13:16:38.0 | 0        | SMS INCOMING   | Tensi Gate - KOHAT                 |
| 354874102008620 | 923339999797 | 923349616677 | 2019-12-03 13:22:37.0 | 0        | SMS INCOMING   | Tensi Gate - KOHAT                 |
| 354874102008620 | 923339999797 | 923368863183 | 2019-12-03 13:31:25.0 | 44       | VOICE OUTGOING | Tensi Gate - KOHAT                 |
| 354874102008620 | 923339999797 | 923355556550 | 2019-12-03 13:32:28.0 | 34       | VOICE OUTGOING | Tensi Gate - KOHAT                 |
| 354874102008620 | 923339999797 | 923368863183 | 2019-12-03 13:40:58.0 | 43       | VOICE OUTGOING | Tensi Gate - KOHAT                 |
| 354874102008620 | 923339999797 | 923337557557 | 2019-12-03 14:02:40.0 | 31       | VOICE INCOMING | Tensi Gate - KOHAT                 |
| 354874102008620 | 923339999797 | 923368863183 | 2019-12-03 14:28:39.0 | 155      | VOICE OUTGOING | Tensi Gate - KOHAT                 |
| 354874102008620 | 923339999797 | 923368863183 | 2019-12-03 14:45:55.0 | 18       | VOICE OUTGOING | Tensi Gate - KOHAT                 |
| 354874102008620 | 923339999797 | 923340538329 | 2019-12-03 15:33:31.0 | 0        | SMS INCOMING   | Tensi Gate - KOHAT                 |

ajj



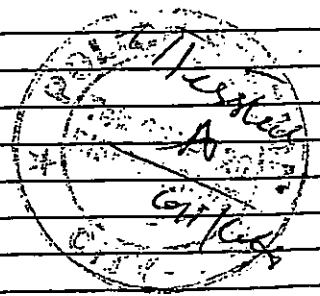
| Sr            | A Number    | B Number     | Call Start Time  | Call End Time    | Call Duration | Call Type | Type  | Location - A                  |
|---------------|-------------|--------------|------------------|------------------|---------------|-----------|-------|-------------------------------|
| 1579111250980 | 92335556550 | 923377570809 | 03/12/2019 12:56 | 03/12/2019 12:57 | 21            | INCOMING  | VO-CE | Sargal - KOHAT                |
| 1579111250980 | 92335556550 | 923345506365 | 03/12/2019 12:57 | 03/12/2019 12:58 | 15            | INCOMING  | VOICE | Sargal - KOHAT                |
| 1579111250980 | 92335556550 | 923345506365 | 03/12/2019 13:07 | 03/12/2019 13:08 | 64            | INCOMING  | VOICE | Check Post Hangu Road - KOHAT |
| 1579111250980 | 92335556550 | 923315971691 | 03/12/2019 13:16 | 03/12/2019 13:16 | 0             | INCOMING  | SMS   | Check Post Hangu Road - KOHAT |
| 1579111250980 | 92335556550 | 923369651718 | 03/12/2019 13:24 | 03/12/2019 13:25 | 49            | OUTGOING  | VOICE | Check Post Hangu Road - KOHAT |
| 1579111250980 | 92335556550 | 923306987605 | 03/12/2019 13:30 | 03/12/2019 13:31 | 47            | INCOMING  | VOICE | Check Post Hangu Road - KOHAT |
| 1579111250980 | 92335556550 | 923339999797 | 03/12/2019 13:32 | 03/12/2019 13:33 | 34            | INCOMING  | VOICE | Check Post Hangu Road - KOHAT |
| 1579111250980 | 92335556550 | 923365065370 | 03/12/2019 13:34 | 03/12/2019 13:34 | 12            | OUTGOING  | VOICE | Check Post Hangu Road - KOHAT |
| 1579111250980 | 92335556550 | 923059341954 | 03/12/2019 13:53 | 03/12/2019 13:53 | 0             | INCOMING  | SMS   | Garhi Muwaz Khan - KOHAT      |
| 1579111250980 | 92335556550 | 923059341954 | 03/12/2019 13:53 | 03/12/2019 13:54 | 22            | OUTGOING  | VOICE | Tehsil Gate - KOHAT           |
| 1579111250980 | 92335556550 | 923059341954 | 03/12/2019 14:06 | 03/12/2019 14:06 | 0             | INCOMING  | SMS   | Tehsil Gate - KOHAT           |
| 1579111250980 | 92335556550 | 923335090605 | 03/12/2019 14:07 | 03/12/2019 14:10 | 152           | OUTGOING  | VOICE | Tehsil Gate - KOHAT           |
| 1579111250980 | 92335556550 | 923335090605 | 03/12/2019 14:08 | 03/12/2019 14:08 | 0             | INCOMING  | SMS   | Tehsil Gate - KOHAT           |
| 1579111250980 | 92335556550 | 923306987605 | 03/12/2019 14:34 | 03/12/2019 14:37 | 148           | INCOMING  | VOICE | Check Post Hangu Road - KOHAT |
| 1579111250980 | 92335556550 | 923059341954 | 03/12/2019 14:59 | 03/12/2019 14:59 | 27            | OUTGOING  | VOICE | Check Post Hangu Road - KOHAT |
| 1579111250980 | 92335556550 | 923059341954 | 03/12/2019 15:07 | 03/12/2019 15:08 | 13            | OUTGOING  | VOICE | Oblan Camp - KOHAT            |
| 1579111250980 | 92335556550 | 923345506365 | 03/12/2019 15:09 | 03/12/2019 15:09 | 0             | INCOMING  | SMS   | Oblan Camp - KOHAT            |
| 1579111250980 | 92335556550 | 923339999797 | 03/12/2019 15:13 | 03/12/2019 15:14 | 55            | INCOMING  | VOICE | Oblan Camp - KOHAT            |
| 1579111250980 | 92335556550 | 923339999797 | 03/12/2019 15:28 | 03/12/2019 15:28 | 26            | INCOMING  | VOICE | Cantt Kohat - KOHAT           |
| 1579111250980 | 92335556550 | 923368863183 | 03/12/2019 16:01 | 03/12/2019 16:02 | 67            | INCOMING  | VOICE | Dhoda Rd Kohat - KOHAT        |
| 1579111250980 | 92335556550 | 923059341954 | 03/12/2019 16:09 | 03/12/2019 16:09 | 0             | INCOMING  | SMS   | Bus Stand - KOHAT             |
| 1579111250980 | 92335556550 | 923339999797 | 03/12/2019 16:09 | 03/12/2019 16:12 | 162           | INCOMING  | VOICE | Bus Stand - KOHAT             |
| 1579111250980 | 92335556550 | 923339999797 | 03/12/2019 16:17 | 03/12/2019 16:20 | 160           | INCOMING  | VOICE | Bus Stand - KOHAT             |
| 1579111250980 | 92335556550 | 923339617279 | 03/12/2019 16:21 | 03/12/2019 16:21 | 11            | INCOMING  | VOICE | Bus Stand - KOHAT             |
| 1579111250980 | 92335556550 | 923330655027 | 03/12/2019 16:25 | 03/12/2019 16:26 | 63            | OUTGOING  | VOICE | Miangan Colony - KOHAT        |
| 1579111250980 | 92335556550 | 923339999797 | 03/12/2019 16:30 | 03/12/2019 16:30 | 35            | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 1579111250980 | 92335556550 | 923364672541 | 03/12/2019 16:32 | 03/12/2019 16:32 | 19            | OUTGOING  | VOICE | Usmania colony - KOHAT        |
| 1579111250980 | 92335556550 | 923335090605 | 03/12/2019 16:56 | 03/12/2019 16:56 | 21            | INCOMING  | VOICE | Usmania colony - KOHAT        |
| 1579111250980 | 92335556550 | 923364672541 | 03/12/2019 16:58 | 03/12/2019 16:59 | 22            | INCOMING  | VOICE | Usmania colony - KOHAT        |
| 1579111250980 | 92335556550 | 923339617279 | 03/12/2019 17:14 | 03/12/2019 17:14 | 19            | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 1579111250980 | 92335556550 | 923339999797 | 03/12/2019 17:23 | 03/12/2019 17:24 | 36            | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 1579111250980 | 92335556550 | 923035141917 | 03/12/2019 17:33 | 03/12/2019 17:34 | 19            | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 1579111250980 | 92335556550 | 923035141917 | 03/12/2019 17:39 | 03/12/2019 17:40 | 63            | OUTGOING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 1579111250980 | 92335556550 | 923339623479 | 03/12/2019 18:13 | 03/12/2019 18:16 | 160           | INCOMING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 1579111250980 | 92335556550 | 923335090605 | 03/12/2019 18:17 | 03/12/2019 18:18 | 63            | INCOMING  | VOICE | Tehsil Gate - KOHAT           |
| 1579111250980 | 92335556550 | 923339999797 | 03/12/2019 18:48 | 03/12/2019 18:48 | 8             | INCOMING  | VOICE | Tehsil Gate - KOHAT           |
| 1579111250980 | 92335556550 | 923339999797 | 03/12/2019 18:57 | 03/12/2019 18:57 | 5             | INCOMING  | VOICE | Usmania colony - KOHAT        |
| 1579111250980 | 92335556550 | 923345506365 | 03/12/2019 19:54 | 03/12/2019 19:54 | 33            | OUTGOING  | VOICE | Usmania Colony - KOHAT        |
| 1579111250980 | 92335556550 | 923345506365 | 03/12/2019 20:01 | 03/12/2019 20:01 | 18            | OUTGOING  | VOICE | Usmania Colony - KOHAT        |



|                 | A Number     | B Number     | Call Start Time  | Call End Time    | Call Duration | Call Type | Type  | Location - A                  |
|-----------------|--------------|--------------|------------------|------------------|---------------|-----------|-------|-------------------------------|
| 351579111250980 | 923355556550 | 923366661775 | 03/12/2019 20:29 | 03/12/2019 20:29 | 32            | INCOMING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923369651718 | 03/12/2019 21:27 | 03/12/2019 21:27 | 0             | INCOMING  | SMS   |                               |
| 351579111250980 | 923355556550 | 923355557550 | 03/12/2019 22:37 | 03/12/2019 22:37 | 9             | INCOMING  | VOICE | Tensli Gate - KOHAT           |
| 351579111250980 | 923355556550 | 923369651718 | 03/12/2019 22:46 | 03/12/2019 22:48 | 112           | OUTGOING  | VOICE | Tensli Gate - KOHAT           |
| 351579111250980 | 923355556550 | 923355557550 | 03/12/2019 23:53 | 03/12/2019 23:54 | 31            | INCOMING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923355557550 | 04/12/2019 0:48  | 04/12/2019 0:49  | 14            | OUTGOING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923355557550 | 04/12/2019 6:04  | 04/12/2019 6:05  | 55            | OUTGOING  | VOICE | Kohat - KOHAT                 |
| 351579111250980 | 923355556550 | 923339618676 | 04/12/2019 6:51  | 04/12/2019 6:52  | 17            | OUTGOING  | VOICE | Bus Stand - KOHAT             |
| 351579111250980 | 923355556550 | 923341904204 | 04/12/2019 7:05  | 04/12/2019 7:05  | 15            | OUTGOING  | VOICE | Bus Stand - KOHAT             |
| 351579111250980 | 923355556550 | 923341904204 | 04/12/2019 7:07  | 04/12/2019 7:08  | 24            | OUTGOING  | VOICE | Bus Stand - KOHAT             |
| 351579111250980 | 923355556550 | 923341904204 | 04/12/2019 7:12  | 04/12/2019 7:13  | 32            | OUTGOING  | VOICE | Bahdur Kot - KOHAT            |
| 351579111250980 | 923355556550 | 923363631313 | 04/12/2019 7:15  | 04/12/2019 7:17  | 130           | OUTGOING  | VOICE | Bahdur Kot - KOHAT            |
| 351579111250980 | 923355556550 | 923341904204 | 04/12/2019 7:22  | 04/12/2019 7:22  | 13            | OUTGOING  | VOICE | Behzadi Chiker kot. - KOHAT   |
| 351579111250980 | 923355556550 | 923341904204 | 04/12/2019 7:43  | 04/12/2019 7:45  | 143           | OUTGOING  | VOICE | Pir Khel - KOHAT              |
| 351579111250980 | 923355556550 | 923341904204 | 04/12/2019 7:46  | 04/12/2019 7:47  | 21            | OUTGOING  | VOICE | Pir Khel - KOHAT              |
| 351579111250980 | 923355556550 | 923369655393 | 04/12/2019 8:22  | 04/12/2019 8:22  | 0             | INCOMING  | SMS   | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923355557550 | 04/12/2019 9:06  | 04/12/2019 9:06  | 31            | OUTGOING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923339617279 | 04/12/2019 9:46  | 04/12/2019 9:46  | 22            | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923339617279 | 04/12/2019 10:03 | 04/12/2019 10:03 | 13            | OUTGOING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923329623477 | 04/12/2019 10:18 | 04/12/2019 10:20 | 125           | OUTGOING  | VOICE | Usmania colony - KOHAT        |
| 351579111250980 | 923355556550 | 923329623477 | 04/12/2019 10:18 | 04/12/2019 10:18 | 0             | INCOMING  | SMS   | Usmania colony - KOHAT        |
| 351579111250980 | 923355556550 | 923345506365 | 04/12/2019 10:21 | 04/12/2019 10:22 | 112           | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923339617279 | 04/12/2019 10:26 | 04/12/2019 10:27 | 25            | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923355557550 | 04/12/2019 10:29 | 04/12/2019 10:29 | 7             | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923341990045 | 04/12/2019 10:29 | 04/12/2019 10:29 | 0             | INCOMING  | SMS   | Usmania colony - KOHAT        |
| 351579111250980 | 923355556550 | 923339651811 | 04/12/2019 10:32 | 04/12/2019 10:33 | 58            | OUTGOING  | VOICE | Usmania colony - KOHAT        |
| 351579111250980 | 923355556550 | 923339617279 | 04/12/2019 10:33 | 04/12/2019 10:33 | 19            | INCOMING  | VOICE | Usmania colony - KOHAT        |
| 351579111250980 | 923355556550 | 923329623477 | 04/12/2019 10:37 | 04/12/2019 10:37 | 24            | INCOMING  | VOICE | Usmania colony - KOHAT        |
| 351579111250980 | 923355556550 | 923369651718 | 04/12/2019 10:47 | 04/12/2019 10:47 | 22            | INCOMING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923337557557 | 04/12/2019 10:52 | 04/12/2019 10:55 | 145           | INCOMING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923329623477 | 04/12/2019 10:55 | 04/12/2019 10:55 | 0             | INCOMING  | SMS   | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923329623477 | 04/12/2019 10:56 | 04/12/2019 10:56 | 43            | OUTGOING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923337557557 | 04/12/2019 11:00 | 04/12/2019 11:01 | 96            | INCOMING  | VOICE | Check Post Hangu Road - KOHAT |
| 351579111250980 | 923355556550 | 923355557550 | 04/12/2019 11:02 | 04/12/2019 11:03 | 19            | OUTGOING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923329623477 | 04/12/2019 11:07 | 04/12/2019 11:07 | 41            | OUTGOING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923329623477 | 04/12/2019 11:11 | 04/12/2019 11:11 | 29            | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923339617279 | 04/12/2019 11:30 | 04/12/2019 11:30 | 33            | OUTGOING  | VOICE | Bus Stand - KOHAT             |
| 351579111250980 | 923355556550 | 923345506365 | 04/12/2019 11:36 | 04/12/2019 11:36 | 0             | INCOMING  | SMS   | Bus Stand - KOHAT             |
| 351579111250980 | 923355556550 | 923337557557 | 04/12/2019 11:36 | 04/12/2019 11:36 | 51            | INCOMING  | VOICE | Bus Stand - KOHAT             |

| Sl. No.      | A Num/CR    | B Num        | Call Start Time  | Call End Time    | Duration | Call Type | Type  | Location - A  | Location - B   |
|--------------|-------------|--------------|------------------|------------------|----------|-----------|-------|---|----------------|
| 157911250980 | 92335556550 | 92335556550  | 02/12/2019 6:08  | 02/12/2019 6:08  | 0        | INCOMING  | SYS   | New Appara acade G-6/1 - ISLAMABAD                            | ISLAMABAD      |
| 157911250980 | 92335556550 | 92335556550  | 02/12/2019 6:10  | 02/12/2019 6:10  | 0        | OUTGOING  | VOICE | New Appara acade G-6/1 - ISLAMABAD                            | ISLAMABAD      |
| 157911250980 | 92335556550 | 92335556550  | 02/12/2019 7:27  | 02/12/2019 7:27  | 0        | OUTGOING  | VOICE | Aabpara - ISLAMABAD   | ISLAMABAD      |
| 157911250980 | 92335556550 | 92335999979  | 02/12/2019 8:04  | 02/12/2019 8:04  | 0        | OUTGOING  | VOICE | New Appara acade G-6/1 - ISLAMABAD                            | ISLAMABAD      |
| 157911250980 | 92335556550 | 923035141917 | 02/12/2019 10:05 | 02/12/2019 10:05 | 0        | INCOMING  | VOICE | New Appara acade G-6/1 - ISLAMABAD                            | ISLAMABAD      |
| 157911250980 | 92335556550 | 923328181733 | 02/12/2019 10:47 | 02/12/2019 10:48 | 69       | INCOMING  | VOICE | New Appara acade G-6/1 - ISLAMABAD                            | ISLAMABAD      |
| 157911250980 | 92335556550 | 923345506365 | 02/12/2019 11:12 | 02/12/2019 11:21 | 484      | INCOMING  | VOICE | New Appara acade G-6/1 - ISLAMABAD                            | ISLAMABAD      |
| 157911250980 | 92335556550 | 923355557550 | 02/12/2019 11:51 | 02/12/2019 11:51 | 14       | OUTGOING  | VOICE | New Appara acade G-6/1 - ISLAMABAD                            | ISLAMABAD      |
| 157911250980 | 92335556550 | 923328181733 | 02/12/2019 12:15 | 02/12/2019 12:15 | 0        | INCOMING  | SMS   | New Appara acade G-6/1 - ISLAMABAD                            | ISLAMABAD      |
| 157911250980 | 92335556550 | 923335090605 | 02/12/2019 12:41 | 02/12/2019 12:42 | 82       | INCOMING  | VOICE | Sufi Rstrnt IT G-9 4 - ISLAMABAD                              | ISLAMABAD      |
| 157911250980 | 92335556550 | 923343583194 | 02/12/2019 13:00 | 02/12/2019 13:03 | 158      | INCOMING  | VOICE | Tarnol - TARNOL   | TARNOL         |
| 157911250980 | 92335556550 | 923369651718 | 02/12/2019 13:06 | 02/12/2019 13:10 | 260      | OUTGOING  | VOICE | Tarnol - TARNOL   | TARNOL         |
| 157911250980 | 92335556550 | 923335090605 | 02/12/2019 13:27 | 02/12/2019 13:27 | 0        | INCOMING  | SMS   |   |                |
| 157911250980 | 92335556550 | 923345506365 | 02/12/2019 13:29 | 02/12/2019 13:29 | 21       | INCOMING  | VOICE | Andor Kot - FATEHJANG   | FATEHJANG      |
| 157911250980 | 92335556550 | 923336573030 | 02/12/2019 13:46 | 02/12/2019 13:46 | 0        | INCOMING  | SMS   |   |                |
| 157911250980 | 92335556550 | 92333999979  | 02/12/2019 13:50 | 02/12/2019 13:51 | 27       | INCOMING  | VOICE | FatehJang - FATEHJANG   | FATEHJANG      |
| 157911250980 | 92335556550 | 923366661775 | 02/12/2019 14:29 | 02/12/2019 14:29 | 0        | INCOMING  | SMS   | Domaille - DOMAILE  | DOMAILE        |
| 157911250980 | 92335556550 | 92333999979  | 02/12/2019 14:46 | 02/12/2019 14:47 | 71       | OUTGOING  | VOICE | Village Rangli - VILLAGE RANGLI                               | VILLAGE RANGLI |
| 157911250980 | 92335556550 | 923345506365 | 02/12/2019 15:12 | 02/12/2019 15:12 | 1        | INCOMING  | VOICE | Mohalla Takia - MOHALLA TAKIA                                 | MOHALLA TAKIA  |
| 157911250980 | 92335556550 | 923345506365 | 02/12/2019 15:13 | 02/12/2019 15:15 | 122      | OUTGOING  | VOICE | Mohalla Takia - MOHALLA TAKIA                                 | MOHALLA TAKIA  |
| 157911250980 | 92335556550 | 923345506365 | 02/12/2019 15:19 | 02/12/2019 15:20 | 34       | INCOMING  | VOICE | Mohalla Takia - MOHALLA TAKIA                                 | MOHALLA TAKIA  |
| 157911250980 | 92335556550 | 923369667245 | 02/12/2019 15:20 | 02/12/2019 15:22 | 98       | OUTGOING  | VOICE | Mohalla Takia - MOHALLA TAKIA                                 | MOHALLA TAKIA  |
| 157911250980 | 92335556550 | 923369667245 | 02/12/2019 15:47 | 02/12/2019 15:48 | 42       | INCOMING  | VOICE | Mohalla Takia - MOHALLA TAKIA                                 | MOHALLA TAKIA  |
| 157911250980 | 92335556550 | 923377570809 | 02/12/2019 16:08 | 02/12/2019 16:10 | 158      | INCOMING  | VOICE | Land between Mobilink Tpower and PTCL Exchange(Jhanda) - JAND | JAND           |
| 157911250980 | 92335556550 | 92333999979  | 02/12/2019 16:15 | 02/12/2019 16:16 | 49       | INCOMING  | VOICE | Khushalgarh - KHUSHALGARH                                     | KHUSHALGARH    |
| 157911250980 | 92335556550 | 92333999979  | 02/12/2019 17:15 | 02/12/2019 17:16 | 32       | OUTGOING  | VOICE | Babri Banda - BABRI BANDA                                     | BABRI BANDA    |
| 157911250980 | 92335556550 | 92333999979  | 02/12/2019 17:18 | 02/12/2019 17:18 | 28       | INCOMING  | VOICE | Babri Banda - BABRI BANDA                                     | BABRI BANDA    |
| 157911250980 | 92335556550 | 923315971691 | 02/12/2019 17:26 | 02/12/2019 17:26 | 39       | INCOMING  | VOICE | Togh Bala - KOHAT   | KOHAT          |
| 157911250980 | 92335556550 | 92333999979  | 02/12/2019 17:29 | 02/12/2019 17:30 | 56       | OUTGOING  | VOICE | Togh Bala - KOHAT   | KOHAT          |
| 157911250980 | 92335556550 | 923339623479 | 02/12/2019 17:32 | 02/12/2019 17:32 | 20       | INCOMING  | VOICE | Bahdur Kot - KOHAT  | KOHAT          |
| 157911250980 | 92335556550 | 92333999979  | 02/12/2019 17:34 | 02/12/2019 17:35 | 63       | INCOMING  | VOICE | Sector 2 college town - KOHAT                                 | KOHAT          |
| 157911250980 | 92335556550 | 923369667245 | 02/12/2019 17:42 | 02/12/2019 17:43 | 40       | INCOMING  | VOICE | Station Headquarters Konat - KOHAT                            | KOHAT          |
| 157911250980 | 92335556550 | 92333999979  | 02/12/2019 17:46 | 02/12/2019 17:46 | 32       | INCOMING  | VOICE | Tensil Gate - KOHAT   | KOHAT          |
| 157911250980 | 92335556550 | 92333999979  | 02/12/2019 17:53 | 02/12/2019 17:53 | 11       | OUTGOING  | VOICE | Garhi Muwaz Khan - KOHAT                                      | KOHAT          |
| 157911250980 | 92335556550 | 923368863183 | 02/12/2019 17:55 | 02/12/2019 17:55 | 12       | OUTGOING  | VOICE | Usmania Colony - KOHAT  | KOHAT          |
| 157911250980 | 92335556550 | 923345506365 | 02/12/2019 17:59 | 02/12/2019 17:59 | 23       | OUTGOING  | VOICE | Usmania Colony - KOHAT  | KOHAT          |
| 157911250980 | 92335556550 | 923345506365 | 02/12/2019 18:03 | 02/12/2019 18:04 | 117      | OUTGOING  | VOICE | Usmania Colony - KOHAT  | KOHAT          |
| 157911250980 | 92335556550 | 923059341854 | 02/12/2019 18:09 | 02/12/2019 18:13 | 283      | OUTGOING  | VOICE | Usmania Colony - KOHAT  | KOHAT          |

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76  
(0335-5556550)



| A Number        | B Number    | Call Start Time | Call End Time    | Call Duration    | Call Type | Type     | Location - /                        |
|-----------------|-------------|-----------------|------------------|------------------|-----------|----------|-------------------------------------|
| 9111250980      | 92335556550 | 923345506365    | 02/12/2019 18:14 | 02/12/2019 18:14 | 6         | ACC V AG | VOICE Usmania Colony - KOHAT        |
| 3579111250980   | 92335556550 | 923325317113    | 02/12/2019 18:17 | 02/12/2019 18:21 | 241       | OUTGOING | VOICE Usmania Colony - KOHAT        |
| 3579111250980   | 92335556550 | 923315971691    | 02/12/2019 18:21 | 02/12/2019 18:21 | 0         | ACC V AG | SMS Usmania Colony - KOHAT          |
| 351579111250980 | 92335556550 | 923345506365    | 02/12/2019 18:22 | 02/12/2019 18:29 | 395       | INCOMING | VOICE Usmania Colony - KOHAT        |
| 351579111250980 | 92335556550 | 923345506365    | 02/12/2019 18:36 | 02/12/2019 18:43 | 377       | INCOMING | VOICE Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 92335556550 | 923339999797    | 02/12/2019 18:41 | 02/12/2019 18:42 | 89        | INCOMING | VOICE Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 92335556550 | 923345506365    | 02/12/2019 18:43 | 02/12/2019 19:26 | 2577      | OUTGOING | VOICE Tehsil Gate - KOHAT           |
| 351579111250980 | 92335556550 | 923339634123    | 02/12/2019 19:20 | 02/12/2019 19:22 | 65        | INCOMING | VOICE Tehsil Gate - KOHAT           |
| 351579111250980 | 92335556550 | 923339999797    | 02/12/2019 20:18 | 02/12/2019 20:18 | 0         | INCOMING | SMS Usmania Colony - KOHAT          |
| 351579111250980 | 92335556550 | 923339634123    | 02/12/2019 20:20 | 02/12/2019 20:20 | 0         | INCOMING | SMS Usmania Colony - KOHAT          |
| 351579111250980 | 92335556550 | 923059341954    | 03/12/2019 7:34  | 03/12/2019 7:34  | 0         | INCOMING | SMS Tehsil Gate - KOHAT             |
| 351579111250980 | 92335556550 | 92335557550     | 03/12/2019 8:03  | 03/12/2019 8:04  | 21        | OUTGOING | VOICE Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 92335556550 | 923315971691    | 03/12/2019 8:42  | 03/12/2019 8:42  | 25        | INCOMING | VOICE Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 92335556550 | 923345506365    | 03/12/2019 8:59  | 03/12/2019 9:01  | 105       | OUTGOING | VOICE Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 92335556550 | 923335090605    | 03/12/2019 9:04  | 03/12/2019 9:06  | 128       | INCOMING | VOICE Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 92335556550 | 923369651718    | 03/12/2019 9:20  | 03/12/2019 9:24  | 287       | OUTGOING | VOICE Usmania Colony - KOHAT        |
| 351579111250980 | 92335556550 | 923335090605    | 03/12/2019 9:25  | 03/12/2019 9:25  | 0         | INCOMING | SMS Usmania Colony - KOHAT          |
| 351579111250980 | 92335556550 | 923335090605    | 03/12/2019 9:32  | 03/12/2019 9:37  | 328       | INCOMING | VOICE Usmania Colony - KOHAT        |
| 351579111250980 | 92335556550 | 923345506365    | 03/12/2019 9:37  | 03/12/2019 9:38  | 25        | OUTGOING | VOICE Usmania Colony - KOHAT        |
| 351579111250980 | 92335556550 | 923339617279    | 03/12/2019 9:43  | 03/12/2019 9:46  | 141       | INCOMING | VOICE Usmania Colony - KOHAT        |
| 351579111250980 | 92335556550 | 923345506365    | 03/12/2019 10:24 | 03/12/2019 10:28 | 214       | OUTGOING | VOICE Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 92335556550 | 923345506365    | 03/12/2019 10:30 | 03/12/2019 10:30 | 26        | INCOMING | VOICE Check Post Hangu Road - KOHAT |
| 351579111250980 | 92335556550 | 923345506365    | 03/12/2019 10:54 | 03/12/2019 10:55 | 59        | OUTGOING | VOICE Check Post Hangu Road - KOHAT |
| 351579111250980 | 92335556550 | 923339634123    | 03/12/2019 11:13 | 03/12/2019 11:13 | 14        | INCOMING | VOICE Check Post Hangu Road - KOHAT |
| 351579111250980 | 92335556550 | 923339651811    | 03/12/2019 11:29 | 03/12/2019 11:30 | 27        | OUTGOING | VOICE Check Post Hangu Road - KOHAT |
| 351579111250980 | 92335556550 | 923345506365    | 03/12/2019 11:32 | 03/12/2019 11:33 | 18        | INCOMING | VOICE Check Post Hangu Road - KOHAT |
| 351579111250980 | 92335556550 | 923345506365    | 03/12/2019 11:34 | 03/12/2019 11:35 | 25        | OUTGOING | VOICE Check Post Hangu Road - KOHAT |
| 351579111250980 | 92335556550 | 923345506365    | 03/12/2019 11:43 | 03/12/2019 11:43 | 9         | INCOMING | VOICE Tehsil Gate - KOHAT           |
| 351579111250980 | 92335556550 | 923345506365    | 03/12/2019 11:52 | 03/12/2019 11:52 | 20        | INCOMING | VOICE Tehsil Gate - KOHAT           |
| 351579111250980 | 92335556550 | 923345506365    | 03/12/2019 11:53 | 03/12/2019 11:54 | 21        | OUTGOING | VOICE Pir Khel - KOHAT              |
| 351579111250980 | 92335556550 | 923347515598    | 03/12/2019 11:54 | 03/12/2019 11:55 | 53        | INCOMING | VOICE Pir Khel - KOHAT              |
| 351579111250980 | 92335556550 | 923345506365    | 03/12/2019 11:55 | 03/12/2019 11:56 | 31        | INCOMING | VOICE Pir Khel - KOHAT              |
| 351579111250980 | 92335556550 | 923325753577    | 03/12/2019 12:29 | 03/12/2019 12:30 | 48        | OUTGOING | VOICE Tehsil Gate - KOHAT           |
| 351579111250980 | 92335556550 | 923325753577    | 03/12/2019 12:32 | 03/12/2019 12:34 | 21        | OUTGOING | VOICE Tehsil Gate - KOHAT           |
| 351579111250980 | 92335556550 | 923339999797    | 03/12/2019 12:42 | 03/12/2019 12:43 | 21        | ACC V AG | VOICE Tehsil Gate - KOHAT           |
| 351579111250980 | 92335556550 | 92335557550     | 03/12/2019 12:43 | 03/12/2019 12:45 | 33        | ACC V AG | VOICE Tehsil Gate - KOHAT           |
| 351579111250980 | 92335556550 | 92335557550     | 03/12/2019 12:48 | 03/12/2019 12:49 | 12        | ACC V AG | VOICE Tehsil Gate - KOHAT           |
| 351579111250980 | 92335556550 | 923345506365    | 03/12/2019 12:53 | 03/12/2019 12:53 | 59        | OUTGOING | VOICE Tehsil Gate - KOHAT           |
| 351579111250980 | 92335556550 | 92335557550     | 03/12/2019 12:53 | 03/12/2019 12:53 | 37        | OUTGOING | VOICE Sangla - KOHAT                |

26

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

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**Service Appeal No. 3326/2020**

**Abdul Wahab Ex-Constable No. 50**

..... **Appellant**

**VERSUS**

**Inspector General of Police,  
Khyber Pakhtunkhwa & others**

..... **Respondents**

**PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1 TO 3**

**Respectively Sheweth:-**

**Preliminary Objections:-**

- i. That the appellant has got no cause of action.
- ii. That the appellant has got no locus standi.
- iii. That the appeal is not maintainable in its present form.
- iv. That the appeal is bad in law and not maintainable as the appellant has not questioned the order of respondent No. 2 vide which the departmental appeal of the appellant was rejected.
- v. That the appellant is estopped to file the instant appeal for his own act.
- vi. That the appellant has not approached the honorable Tribunal with clean hands.
- vii. That the appeal is bad for misjoinder and non-joinder of necessary parties.
- viii. That the appeal of the appellant is badly time barred.

**Facts:-**

1. One Mst. Fatima Gul Bibi w/r Israr Khan r/o Mohallah Mian Badshah Kohat reported to local Police on 3<sup>rd</sup> December-2019 that one the eventful day at 16:30 hrs her house door was knocked. She opened the door and witnessed that one person wearing Police uniform and face mask, who asked about any male of her family. She informed her son named Ali Israr, who went out and the aforesaid person took away him in a motorcar in context of search of his house. She reported for search of her son, upon which an investigation u/s 156 (iii) CrPC was initiated. The investigation culminated in registration of FIR vide No. 1593 dated 05.12.2019 u/s 365 PPC PS City Kohat. Copy is **annexure A.**



During course of investigation of the case. SP investigation vide his report dated 24.12.2019 submitted that SHO Ayat Ullah (now dismissed in the said incident) and his gunners named constable Abdul Wahab (present appellant) and Muhammad Abid were constantly in contact with the accused subsequently charged in the case. In this regard SP investigation obtained CDR of the accused, which established the telephonic contact of appellant and others with accused of the aforesaid criminal case. Copy of report is **annexure B**.

On the involvement of appellant in a heinous crime and pursuant to the report of SP Investigation, Kohat, the respondent No. 3 initiated departmental proceedings against the appellant under the relevant rules. During course of inquiry proceedings, the appellant was held guilty of the charge. Therefore, on completion of all codal formalities the appellant was awarded punishment commensurate to the charges by the respondent No. 3. Copy of inquiry report is **annexure C**.

As contemplated from the report of SP investigation, Kohat the appellant was served with charge sheet with statement of allegation and a regular inquiry was initiated against the appellant. The inquiry officer filed his report and held him guilty of the charges, upon which the appellant was served with final show cause notice. Hence, a regular inquiry was conducted against the appellant and he was associated with the inquiry proceedings, hence, question of ex-parte does not arise / establish. Copy of final show cause notice with signature of receipt of appellant is **annexure D**.

Incorrect, the charges / allegations leveled against the appellant were established beyond any shadow of doubt.

Incorrect, a regular inquiry was conducted, the appellant was associated with the proceedings and afforded ample opportunity of defense, but failed to submit any plausible explanation / reply to his criminal act / misconduct.

Incorrect, the charges / allegations leveled against the appellant during the departmental inquiry were established beyond any shadow of doubt.

Irrelevant, criminal and departmental proceedings are different in nature. The conduct of the appellant was established technically and from the evidence placed on inquiry file.

The appellant has admitted his guilt in this para of the memorandum of appeal as telephonically contact with the criminals charge in the aforesaid case.

Incorrect, reward and punishment in a disciplined department runs side by side and the appellant cannot take benefit of his good entry if any. Furthermore, the appellant was proceeded with departmentally for his gross professional misconduct.

Incorrect, reply is submitted in the above paras.

The departmental appeal of the appellant was processed by respondent No. 2, accordingly, found devoid of merits and rejected vide order dated 25.06.2020 which is not questioned by the appellant. Copy is **annexure E**.

Incorrect, the appellant was proceeded with departmentally by respondent No. 3 for his own serious criminal act. Furthermore, the case law referred by the appellant is not relevant to the instant appeal.

Incorrect, all codal formalities were fulfilled by the respondent during the entire departmental proceedings.


**Grounds:-**

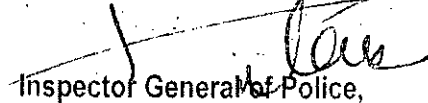
- a. Incorrect, a regular departmental inquiry was conducted against the appellant in accordance with the rules. There was sufficient documentary / technical evidence against the appellant i.e CDR and charges were established against appellant during departmental probe.
- b. Incorrect, the appellant was properly served with charge sheet / statement of allegations, final show cause notice and associated with the proceedings. The material / evidence collected during the proceedings were considered, which connected the appellant with the commission of gross professional misconduct, in addition to commission of criminal act.
- c. Incorrect, the appellant was associated with the proceedings and heard in person but fail to submit any plausible explanation.
- d. Incorrect, a legal and speaking order based on the charges / allegations and evidence was passed by the respondent No. 3 being competent authority under the rules.
- e. Incorrect, the departmental proceedings were conducted against the appellant on the basis of findings report of SP investigation Kohat wherein the telephonic contact of the appellant with accused was ascertained through CDR collected in investigation of criminal case. Copy of report of I.O is **annexure F**.
- f. Incorrect, no constitutional / fundamental right of the appellant was violated as he being member of a disciplined department was proceeded with departmentally for his misconduct under the relevant rules.
- g. Incorrect, the appellant was awarded appropriate punishment commensurate to the charges / allegations proved against him during departmental probe.
- h. Incorrect, the appellant has indifferent service record. The act committed by the appellant decreased the

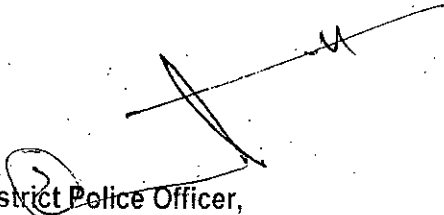
- i. Incorrect, the appellant was proceeded with departmentally under the relevant rules.
- j. Incorrect, para No. j of the memorandum of appeal is replication and reply has submitted in the above paras.
- k. Incorrect, a legal and speaking order is passed in accordance with the facts and rules.
- l. Incorrect, all codal formalities have been fulfilled according to law & rules.
- m. Incorrect, all codal formalities have been fulfilled according to law & rules.

**Prayer** -

In view of the above, it is prayed that the appeal being contrary to facts, law & rules and devoid of merits, may graciously be dismissed with costs.

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

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

  
District Police Officer,  
Kohat  
(Respondent No. 3)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 3326/2020  
Abdul Wahab Ex-Constable No. 50

..... Appellant

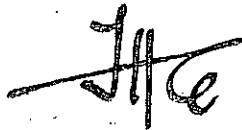
VERSUS

Inspector General of Police,  
Khyber Pakhtunkhwa & others

..... Respondents

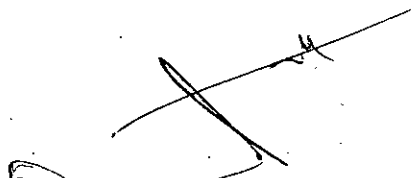
COUNTER AFFIDAVIT

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



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

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

  
District Police Officer,  
Kohat  
(Respondent No. 3)



OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
PESHAWAR.

No. SI/ 785 /21, dated Peshawar the 04/03 /2021.

**ORDER**

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by **Ex-FC Abdul Wahab No. 50**. The petitioner was dismissed from service by District Police Officer, Kohat vide OB No. 34, dated 16.01.2020 on the allegations that he while posted as GUNNER with SHO PS City, a case vide FIR No. 1593, dated 15.12.2019 u/s 365 PPC was registered in PS City. During course of investigation, SP Investigation, vide his report No. 6440/Reader, dated 24.12.2019 intimated that the SHO and his GUNNER/DRIVER had in contact with accused and his CDR was obtained in this regard. Complainants of the said FIR, reported regarding taking of his son by a person in Police uniform. It has also been reported that he had contact with the accused on the eventful day i.e. before and after the occurrence. His appeal was rejected by Regional Police Officer, Kohat vide order Endst: No. 6899/EC, dated 06.07.2020.

Meeting of Appellate Board was held on 14.01.2021 wherein petitioner was heard in person. Petitioner contended that accused involved in case FIR No. 1593, dated 15.12.2019 u/s 365 PPC PS City was acquitted by the court vide judgment dated 10.10.2020 on the basis of complainant's statement wherein she stated that she did not want to charge anyone for the commission of offence.

Perusal of enquiry papers reveals that the allegations against the petitioner have been proved from CDR and investigation. Therefore, the Board decided that his petition is hereby rejected.

Sd/-

**KASHIF ALAM, PSP**  
Additional Inspector General of Police,  
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. SI/ 786-96 /21,

Copy of the above is forwarded to the:

1. Regional Police Officer, Kohat.
2. District Police Officer, Kohat.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
5. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV CPO Peshawar.

**(IRFAN ULHAQ KHAN) PSP**  
AIG/Establishment,  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

ORDER.

This order will dispose of a departmental appeal, moved by Ex-Constable Abdul Wahab No. 50 of Kohat district against the punishment order, passed by DPO Kohat vide OB No. 34, dated 16.01.2020 whereby he was awarded major punishment of dismissal from service on the following allegations:-

“He while posted as GUNNER WITH SHO PS City, a case vide FIR No. 1593, dated 15.12.2019 u/s 365 PPC was registered in PS City. During course of investigation, SP Investigation vide his report No. 6440/Reader, dated 24.12.2019 intimated that the SHO and his GUNNERS had in contact with accused and his CDR was obtained in this regard. Complainants of the said FIR, reported regarding taking of their son by a person in Police uniform. It has also been reported that he had contact with the accused on the eventful day i.e. before and after the occurrence.”

He preferred an appeal to the undersigned upon which comments were obtained from DPO Kohat and his service documents were perused. He was also heard in person in Orderly Room, held on 25.06.2020. During hearing, he did not advance any plausible explanation in his defense to prove his innocence.

I have gone through the available record and came to the conclusion that the allegations leveled against the appellant are proved beyond any shadow of doubt and the same has also been established by the E.O in his findings. Therefore, his appeal-being devoid of merits is hereby rejected.

Order Announced  
25.06.2020

3458  
8/7/20

*JH Ce*  
(TAYYAB HAFEEZ) PSP  
Region Police Officer,  
Kohat Region.

No. 6855 /EC, dated Kohat the 6/7 /2020.

Copy to DPO/Kohat for information w/r to his office Letter No. 1497/LB, dated 29.01.2020. His Service Roll & Fauji Missal / Enquiry File is returned herewith.

*SRC/PHC*  
*for n. action*  
*HT*

*JH Ce*  
(TAYYAB HAFEEZ) PSP  
Region Police Officer



OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT  
Tel: 0922-9260116 Fax 9260125

## ORDER

This order will dispose of departmental enquiry against constable Abdul Wahab No. 50 of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

- i. Facts arising of the case are that on 03.12.2019, complainant of case FIR No. 1593 dated 05.12.2019 U/S 365 PPC PS City, reported regarding taking of her/his son by a person in Police uniform.
- ii. As contemplated from report of SP Investigation Kohat, that constable Abdul Wahab No. 50 had telephonically contact with charged accused before and after occurrence, which shows professional gross misconduct on his part.

For the above, serious / professional misconduct of the accused constable (gunner). Charge sheet alongwith statement of allegations was served upon the accused constable. SP Operations Kohat was appointed as enquiry officer to scrutinize the conduct of the constable. The enquiry officer stated that the complainant party has patched up the matter with the accused for the reasons best known to him and in order to save the skin of accused official and other police official in the departmental proceedings. However, it has been established that the defaulter official and others are closed to the accused and involved / connivance with the commission of offence. However, irrespective of the statements of the complainant party and confirmation of bail before arrest of the accused, it has been established from CDR and investigation that the accused official and others were in contact with the accused before and after the commission of offence. The defaulter constable has earned a bad name to the entire department and caused damage to the image of Police. Therefore, the charges and allegations leveled against the defaulter official and others have been established beyond any shadow of doubt and recommended for a major punishment. He was further served with Final Show Cause Notice. Reply was received and found unsatisfactory.

In view of the available record, I agree with the findings of enquiry officer, therefore, in exercise of powers conferred upon me under the **rules ibid I, Capt. ® Mansoor Aman, District Police Officer, Kohat** is hereby award a **major punishment of dismissal from service** with immediate effect, kit etc be collected and report

**Announced**

**16.01.2020**

DISTRICT POLICE OFFICER,  
KOHAT

OB No. 34  
Dated 16-01-2020  
No. 197-99 /PA dated Kohat the 16-1-2020.

- Copy of above is submitted for favour of information to the:-
1. Regional Police Officer, Kohat please
  2. R.I/Reader/Pay officer/SRC/OHC for necessary action.

DISTRICT POLICE OFFICER,  
KOHAT

17-01-2020  
حیات  
لا تفسد  
وکتی  
مظاہر  
3/3/20



**OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT**

Tel: 0922-9260116 Fax 9260125

No 190 /PA dated Kohat the 15/1 /2020

**FINAL SHOW CAUSE NOTICE**

1. I, **Capt. ® Mansoor Aman, District Police Officer, Kohat** as competent authority, under the Khyber Pakhtunkhwa Police Rules 1975, (amended 2014) is hereby serve you, **Constable Abdul Wahab No. 50** as follow:-

- i. That consequent upon the completion of inquiry conducted against you by the inquiry officer for which you were given opportunity of hearing vide office No. 59027-28/PA dated 27.12.2019.
- ii. On going, through the finding and recommendations of the inquiry officer, the material on record and other connected papers including your defense before the inquiry officer.

I am satisfied that you have committed the following acts/omissions, specified in section 3 of the said ordinance.

- a. **On 03.12.2019, complainant of case FIR No. 1593 dated 05.12.2019 U/S 365 PPC PS City, reported regarding taking of her/his son by a person in Police uniform.**
- b. **As contemplated from report of SP Investigation Kohat, that you constable Abdul Wahab No. 50 had telephonically contact with charged accused before and after occurrence, which shows professional gross misconduct on your part.**

2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you major penalty provided under the Rules **ibid.**

3. 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.

4. If no reply to this notice is received within 07 days of its delivery in the normal course of circumstances, it shall be presumed that you have no defence to put in and in that case as ex-parte action shall be taken against you.

5. The copy of the finding of inquiry officer is enclosed.

*AR*  
*15/1*

**DISTRICT POLICE OFFICER,  
KOHAT**



صباح عالی!

حوالہ شامل ٹیگور ٹیگورٹی عبیری - 190/19

عصا 15 1/2 سے پہلے پہلے کہ جو جو

میں نے اپنی رائے میں زبردستی لکھی ہے

دیجئے - وہی فرمایا ہے - اس میں کوئی

رہنمائی نہیں کرنا چاہتا - یہی میرا مقصد

تھیوٹوٹوٹی کی بیان ہے

میں نے اس کے جواب میں 50 سالوں میں لکھی

APDS

**DEPARTMENTAL ENQUIRY AGAINST CONSTABLE ABDUL WAHAB NO. 50**

Respected Sir,

It is submitted that I have been appointed as enquiry officer, in departmental proceedings initiated against constable Abdul Wahab No. 50.

Short facts of the case are that on 03.12.2019 at 17:00 hrs complainant Fatima Gul Bibi r/o Muhallah Mian Badshah Kohat City reported the local Police that at 16:30 hrs her house door was knocked, upon which she opened the door and found a person in Police uniform wearing mask. She informed her son named Muhammad Ali. In the meanwhile her son was taken away by persons wearing Police uniform in a vittz motorcar. In the meantime Israr Khan husband of the complainant unfolded that he has got dispute over landed property with one Farhad s/o Nasrullah r/o Ghari Dhodewal, who was not paying Rs. 95 lac as sale consideration of land and threatened for dire consequences. He suspects that his son was taken away by him in Police uniform. The report was entered in daily diary No. 36 dated 03.12.2019 and investigation u/s 156 (iii) CrPC was initiated. Later on the abductee name above appeared before the Police and stated that on the eventful day two person in Police uniform and two others in civvies have taken away in a white color motorcar and asked that SHO has called him. The victim was examined u/s 161 & 164 CrPC. The proceedings culminated into registration of FIR vide No. 1593 dated 05.12.2019 u/s 365 PPC PS City against three accused.

As reported by SP Investigation vide his office No. 4640/Reader dated 24.12.2019 that SHO Ayat Ullah and his gunners named constable Abdul Wahab and Muhammad Abid had made telephonically contact with the accused before and after the commission of offence. They were called and interrogated during the course of investigation. Their contact with accused was established through CDR.

On the above, charge sheet and statement of allegations was issued against the defaulter official on the below charges:-

- i. On 03.12.2019, complainant of case FIR No. 1593, dated 05.12.2019 u/s 365 PPC PS City, reported regarding taking of her/his son by a person in Police uniform.
- ii. As contemplated from report of SP Investigation Kohat, you constable Abdul Wahab had telephonically contacted with charged accused before and after occurrence, which show professional gross misconduct on your part.
- iii. It was also reported that you have also in contact with the accused on the eventful day i.e before and after the occurrence.

The charge sheet alongwith statement of the allegations was served upon the defaulter official, to which he submitted reply and deny the charge / allegations leveled against him.

In order to scrutinize the conduct of the accused official the following officials / witnesses were examined in presence of accused official.

1. SI Anwar Shah O.I.I
2. Israr Khan (husband of complainant) s/o Nisar Khan r/o Ghari Mawaz Khan.
3. Mst: Fatima Gul complainant,
4. Muhammad Ali abductee.
5. Farhad s/o Nasrullah accused.

Besides facts of the case and investigation the witness O.I.I stated that CDR of accused Farhad was obtained which transpired that the accused official and his driver constables named above remained in contact with accused on the eventful day. He further stated that the victim party was subjected for identification of motorcar and accused but they failed to identify the accused and a motorcar used in the commission of offence.

It is pertinent to mention that all the charge accused have succeeded to secure bail before arrest on the basis of affidavit submitted by victims before the court.

From the above and available record, I have reached to the conclusion that the complainant party has patched up the matter with the accused for the reasons best known to him and in order to save the skin of accused official and SI Ayat Ullah and other accused constable in the departmental proceedings. However, it has been established that the defaulter official, constable Muhammad Abid, co-accused and SI Ayat Ullah the then SHO are closed to the accused and involved in the commission of offence. However, irrespective of the statements of the complainant party and confirmation of bail before arrest of the accused, it has been established from CDR and investigation that the accused official and others were in contact with the accused before and after the commission of offence. The defaulter and other officials have earned a bad name to the entire department and caused damage to the image of Police. Therefore, the charges and allegations leveled against the defaulter official constable Abdul Wahab No. 50 have been established beyond any shadow. Hence, the defaulter official is recommended for a major punishment provided under Khyber Pakhtunkhwa, Police Rules 1975 (Amended 2014).

Submitted please.

W/DPO Kohat

  
SP Operations, Kohat  
(Enquiry Officer)

کاؤنٹر فائل

ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ ۱۵۳ مجموعہ ضابطہ فوجداری

|  |                                  |                            |              |
|--|----------------------------------|----------------------------|--------------|
| تھانہ  | سٹی                              | ضلع                        | کوہاٹ        |
| تاریخ وقت وقوع :-  | 03 <sup>12</sup> / <sub>19</sub> | وقت                        | 16:30 بجے    |
| تاریخ وقت رپورٹ  | 03-12-19                         | وقت                        | 17:00 بجے    |
| تاریخ وقت رپورٹ  | 03-12-19                         | وقت                        | 17:00 بجے    |
| نام و سکونت اطلاع دہندہ مستغنیث  | 14301-1574411-4                  | شناختی کارڈ نمبر انویسٹمنٹ | 0333-9626771 |
| مختصر کیفیت جرم (معدومہ) حال اگر کچھ لیا گیا ہو۔                                     |                                  |                            |              |
| نام و سکونت ملزم   |                                  |                            |              |
| شناختی کارڈ نمبر انویسٹمنٹ   |                                  |                            |              |
| کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو |                                  |                            |              |
| تھانہ سے روانگی کی تاریخ و وقت   |                                  |                            |              |

۱- تاریخ وقت رپورٹ 03-12-19 وقت 17:00 بجے

۲- نام و سکونت اطلاع دہندہ مستغنیث 14301-1574411-4  
شناختی کارڈ نمبر انویسٹمنٹ 0333-9626771

۳- مختصر کیفیت جرم (معدومہ) حال اگر کچھ لیا گیا ہو۔

۴- جائے وقوعہ فاصلہ تھانہ سے اور دست

۵- نام و سکونت ملزم

۶- کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو

۷- تھانہ سے روانگی کی تاریخ و وقت

ابتدائی اطلاع نیچے درج کرو۔

۱۱ سال کی انٹرنیٹ کی رپورٹ کر کے انکو انٹرنیٹ (ISCI) شروع کر کے دوران انکو انٹرنیٹ مفتی محمد علی باریاب سوکر جس کا بیان زیر دفعہ ۱۶۱ CP 161 تکلیف ہو کر بیان کی رہی میں مقدمہ جرم یا درج رجسٹر کیا جا کر انکو انٹرنیٹ کاغذات مع نقل F11 بغرض تفتیش جو الرمز KB شناختی جانتے سے نقل نہیں ہے پر جرم گزارش ہے۔

اسراخان بھر 36 سالہ مکان تمام حیاں یاد شاہ متعلق کارڈ نمبر 14301-1574411-4 CP 161 انویسٹمنٹ نمبر 0333-9626771 فورس

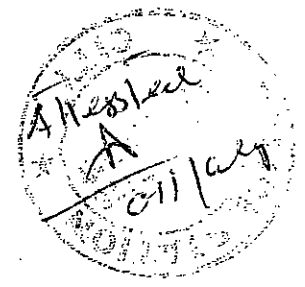
۱۲/3 وقت 17:00 بجے باضری تھانہ انکو رپورٹ کرتی تھیں کہ امیر زمر ویرم میں خانہ خود میں موجود تھی۔ وقت 16:30 بجے کے دوران اسے ہر دستہ کوئی میں نے دروازہ کھولا تو ایک نوجوان جس نے پولیس وردی پہنی ہوئی تھی۔ اور اسے ہر دستہ سے لے کر باہر لے گیا۔

کوئی سرد ہو تو باہر چھو میں نے سپر اعلیٰ اسرا بھر 36 سالہ کو کہا کہ باہر پولیس آئی ہے جا کر دیکھیں میں تھانہ کے دروازے میں کھڑی تھی۔

سپر اعلیٰ کو مذکورہ پولیس کی وردی میں ملے جس شخص نے موٹر کار (بی ۱۱) بزرگ سفید نمبر معلوم میں بھاگ کر چلے گیا کہ ہم اس سے کسی کے گھر کا پتہ پوچھتے ہیں۔ اور چلے گئے۔ میں اس بابت معلوم کرنے آئی ہوں کہ سپر اعلیٰ کو کون پولیس والے اور کون سے پولیس سٹیشن لے گئے ہیں۔ برائے اطلاع رپورٹ آئی ہوں۔ میری رپورٹ بھیجا کر قانونی کارروائی عمل میں لائی جائے۔ نشان انکو ڈھار ڈھار کتہہ کارروائی پولیس کا حسب گفتہ سنا اور رپورٹ درج باہر سوکر بھر متعلق سچائی گئی درست تسلیم کر کے زیر رپورٹ خور نشان انکو ڈھار ڈھار کتہہ کیا۔ اس دوران میں اسراخان اور اسراخان خاوند اس میں حاضر قصاتہ آیا۔ جس نے بیان کیا کہ عمر 8 ماہ قبل میں نے اپنی ارنی 28 مہرہ واقع ڈھیری یا تارنہ میں قبر بارہ لہرا لہرا کر کے کھڑی ڈھوڑ ڈھوڑ لہرا لہرا 95 لاکھ روپے پر فروخت کی تھی۔ جس میں سے تاحال کچھ کوئی رقم وصول نہیں ہوئی ہے اور جب بھی میں نے رقم کار طلبہ کیا ہے تو مذکورہ نے میرے ساتھ تعلقات قائم کر دیئے ہیں۔ اب کچھ شاکھ ہیکہ میرے بیٹے کو رقم معلوم پولیس وردی میں ملے جس میں کس نام آٹھا کر لے گیا ہے۔ اور اپنے مفروضہ عزم حاصل کرنا چاہتا ہے۔ میری سبب ہم اطلاع رپورٹ کرتے ہیں لیکن قانونی تفتیش کے حسب ضابطہ عدوی کی گئی ہے۔

رپورٹ درج باہر سوکر بھر در دستہ تسلیم کر کے زیر رپورٹ خود کو خط انکو انٹرنیٹ کی صورت کیا جس میں تصدیق کرنا چاہوں۔ وقوع کے بارے میں حسب عدویہ ۱۱۵ ص ۱۱۵ انکو انٹرنیٹ (ISCI) شروع کر کے سب سے پہلے اطلاع رپورٹ کی گئی۔ معاملہ میں اصلیت معلوم کر کے تکلیف پندرہ موٹاں ۱۱۵ ص ۱۱۵ کو اطلاع دی گئی۔ ضابطہ اطلاع موٹاں ۱۱۵ ص ۱۱۵ سے اصل سے

| IMSI            | A Number     | B Number     | Call Start Time  | Call End Time    | Call Duration | Call Type | Type  | Location - A            |
|-----------------|--------------|--------------|------------------|------------------|---------------|-----------|-------|-------------------------|
| 351579111250980 | 923355556550 | 923359044743 | 04/12/2019 11:43 | 04/12/2019 11:43 | 0             | INCOMING  | SVS   |                         |
| 351579111250980 | 923355556550 | 923369651718 | 04/12/2019 11:45 | 04/12/2019 11:45 | 0             | INCOMING  | SVS   |                         |
| 351579111250980 | 923355556550 | 923337557557 | 04/12/2019 11:49 | 04/12/2019 11:50 | 54            | INCOMING  | VOICE | Kharmata - KO-A         |
| 351579111250980 | 923355556550 | 923341904204 | 04/12/2019 11:52 | 04/12/2019 11:53 | 35            | INCOMING  | VOICE | Bora Gharl - BORA GHARI |
| 351579111250980 | 923355556550 | 923337557557 | 04/12/2019 12:03 | 04/12/2019 12:05 | 101           | INCOMING  | VOICE | Bili Tang - BILI TANG   |
| 351579111250980 | 923355556550 | 923341904204 | 04/12/2019 12:08 | 04/12/2019 12:08 | 0             | INCOMING  | SMS   |                         |
| 351579111250980 | 923355556550 | 923339617279 | 04/12/2019 12:12 | 04/12/2019 12:13 | 54            | INCOMING  | VOICE |                         |
| 351579111250980 | 923355556550 | 923329623477 | 04/12/2019 12:32 | 04/12/2019 12:34 | 123           | INCOMING  | VOICE |                         |
| 351579111250980 | 923355556550 | 923059341954 | 04/12/2019 12:48 | 04/12/2019 12:49 | 56            | OUTGOING  | VOICE | Rustamabad - RUSTAMABAD |
| 351579111250980 | 923355556550 | 923336573030 | 04/12/2019 12:50 | 04/12/2019 12:51 | 50            | INCOMING  | VOICE | Rustamabad - RUSTAMABAD |



| NO.             | NAME         | MOBILE       | DATE       | TIME       | TYPE           | LOCATION                             |
|-----------------|--------------|--------------|------------|------------|----------------|--------------------------------------|
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 15:05:10.0 | VOICE OUTGOING | Sangair - KOHAT                      |
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| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 15:26:45.0 | VOICE INCOMING | Sangair - KOHAT Stho Cantt           |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 15:28:33.0 | VOICE OUTGOING | Sangair - KOHAT                      |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 15:33:55.0 | VOICE OUTGOING | Sangair - KOHAT                      |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 16:09:42.0 | VOICE OUTGOING | Sangair - KOHAT                      |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 16:14:29.0 | VOICE INCOMING | Sangair - KOHAT → Stho Cantt         |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 16:17:23.0 | VOICE OUTGOING | Sangair - KOHAT                      |
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| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 16:30:20.0 | VOICE OUTGOING | Sangair - KOHAT                      |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 16:31:59.0 | VOICE OUTGOING | Usmania colony - KOHAT Qazafi        |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 16:32:24.0 | VOICE INCOMING | Usmania colony - KOHAT Stho Cantt    |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 16:33:11.0 | VOICE INCOMING | Usmania Colony - KOHAT Stho Cantt    |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 16:34:05.0 | VOICE OUTGOING | Usmania colony - KOHAT Shahzada      |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 16:36:06.0 | VOICE OUTGOING | Usmania Colony - KOHAT Shahzada      |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 16:45:00.0 | VOICE INCOMING | Garki Muwaz Khan - KOHAT Stho Cantt  |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 16:49:25.0 | VOICE INCOMING | Check Post Hangu Road - KOHAT        |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 16:54:37.0 | VOICE INCOMING | Usmania colony - KOHAT               |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 17:05:38.0 | VOICE INCOMING | Check Post Hangu Road - KOHAT        |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 17:11:32.0 | VOICE INCOMING | Nusrat Khei - NUSRAT KHEL            |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 17:12:12.0 | VOICE INCOMING | Nusrat Khei - NUSRAT KHEL Stho Cantt |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 17:23:41.0 | VOICE OUTGOING | Nusrat Khei - NUSRAT KHEL Qazafi     |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 17:35:07.0 | VOICE INCOMING | Garki Muwaz Khan - KOHAT Stho Cantt  |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 17:35:46.0 | VOICE OUTGOING | Garki Muwaz Khan - KOHAT Shahzada    |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 18:01:03.0 | VOICE INCOMING | Wahab Gunner Stho Cantt              |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 18:02:57.0 | VOICE INCOMING | Rauf - DSB                           |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 18:03:15.0 | VOICE INCOMING | Wahab Gunner Stho Cantt              |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 18:35:31.0 | VOICE INCOMING | Wahab Gunner Stho Cantt              |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 18:41:11.0 | VOICE OUTGOING | Wahab Gunner Stho Cantt              |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 18:44:02.0 | VOICE OUTGOING | Minhaj                               |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 18:48:15.0 | VOICE OUTGOING | Qazafi                               |
| 354874102008620 | 923339999797 | 923339999797 | 2019-12-03 | 18:52:00.0 | VOICE OUTGOING | Misshey boy Father - 15 year         |

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|-----------------|--------------|---------------|-----------------------|----|-------|----------|--------------------------|--|
| 354874102008620 | 923339999797 | 923336666868  | 2019-12-03 19:16:13.0 | 59 | VOICE | OUTGOING | Usmania Colony - KOHAT   |  |
| 354874102008620 | 923339999797 | 923336666868  | 2019-12-03 19:31:50.0 | 21 | VOICE | OUTGOING | Usmania Colony - KOHAT   |  |
| 354874102008620 | 923339999797 | 923336666868  | 2019-12-03 19:38:15.0 | 35 | VOICE | OUTGOING | Usmania Colony - KOHAT   |  |
| 354874102008620 | 923339999797 | 9233363631313 | 2019-12-03 19:41:20.0 | 39 | VOICE | OUTGOING | Usmania Colony - KOHAT   | Shahzada   |
| 354874102008620 | 923339999797 | 9233368093577 | 2019-12-03 19:42:24.0 | 14 | VOICE | OUTGOING | Usmania Colony - KOHAT   |  |
| 354874102008620 | 923339999797 | 923339626771  | 2019-12-03 19:49:58.0 | 18 | VOICE | INCOMING | Usmania Colony - KOHAT   | Missing boy - Farhan Israr                             |
| 354874102008620 | 923339999797 | 923348287677  | 2019-12-03 19:54:10.0 | 0  | SMS   | INCOMING | Usmania colony - KOHAT   |  |
| 354874102008620 | 923339999797 | 923348287677  | 2019-12-03 19:54:27.0 | 0  | SMS   | OUTGOING | Usmania Colony - KOHAT   | Wahab Gunner Stho Cantt                                |
| 354874102008620 | 923339999797 | 923339655258  | 2019-12-03 20:16:35.0 | 16 | VOICE | INCOMING | Tehsil Gate - KOHAT      | Wahab Gunner Stho Cantt                                |
| 354874102008620 | 923339999797 | 923339626771  | 2019-12-03 20:27:22.0 | 38 | VOICE | INCOMING | Garni Muwaz Khan - KOHAT |  |
| 354874102008620 | 923339999797 | 923336666868  | 2019-12-03 20:34:05.0 | 10 | VOICE | OUTGOING | Usmania Colony - KOHAT   |  |
| 354874102008620 | 923339999797 | 923339634123  | 2019-12-03 20:43:47.0 | 12 | VOICE | OUTGOING | Garni Muwaz Khan - KOHAT | Stho Cantt   |
| 354874102008620 | 923339999797 | 923337557557  | 2019-12-03 20:45:30.0 | 37 | VOICE | INCOMING | Garni Muwaz Khan - KOHAT |  |
| 354874102008620 | 923339999797 | 923336666868  | 2019-12-03 20:47:10.0 | 30 | VOICE | INCOMING | Tehsil Gate - KOHAT      |  |
| 354874102008620 | 923339999797 | 9233363631313 | 2019-12-03 20:58:19.0 | 44 | VOICE | OUTGOING | Tehsil Gate - KOHAT      | Shahzada   |
| 354874102008620 | 923339999797 | 923336666868  | 2019-12-03 20:59:26.0 | 30 | VOICE | OUTGOING | Tehsil Gate - KOHAT      |  |
| 354874102008620 | 923339999797 | 923339662110  | 2019-12-03 20:59:59.0 | 14 | VOICE | INCOMING | Tehsil Gate - KOHAT      |  |
| 354874102008620 | 923339999797 | 923348287677  | 2019-12-03 21:07:09.0 | 0  | SMS   | INCOMING | Tehsil Gate - KOHAT      | Stho City - Called him to be captured before Stho City |
| 354874102008620 | 923339999797 | 923348287677  | 2019-12-03 21:07:20.0 | 0  | SMS   | INCOMING | Tehsil Gate - KOHAT      | Wahab Gunner Stho Cantt                                |
| 354874102008620 | 923339999797 | 9233363631313 | 2019-12-03 21:07:56.0 | 40 | VOICE | OUTGOING | Tehsil Gate - KOHAT      | Wahab Gunner Stho Cantt                                |
| 354874102008620 | 923339999797 | 923348287677  | 2019-12-03 21:08:26.0 | 0  | SMS   | INCOMING | Tehsil Gate - KOHAT      | Shahzada - Wahab Gunner Stho Cantt                     |

Qazafi

Kauf - DSB

Shahzada

Missing boy - Farhan Israr

Wahab Gunner Stho Cantt

Wahab Gunner Stho Cantt

Stho Cantt

Shahzada

Stho City - Called him to be captured before Stho City

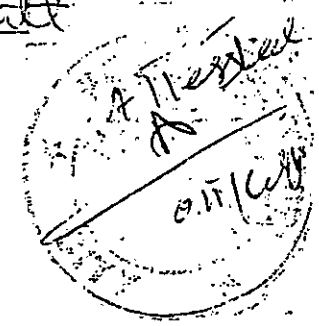
Wahab Gunner Stho Cantt

Wahab Gunner Stho Cantt

Shahzada

Wahab Gunner Stho Cantt

11/12/19







| SL. NO.         | A NUMBER     | B NUMBER      | CALL START TIME       | DUR TYPE | DIR   | LOCATION |                                   |
|-----------------|--------------|---------------|-----------------------|----------|-------|----------|-----------------------------------|
| 354874102008620 | 923339999797 | 923337557557  | 2019-12-02 16:45:22.0 | 0        | SMS   | OUTGOING | Naxosard - KOHA                   |
| 354874102008620 | 923339999797 | 923337557557  | 2019-12-02 16:46:07.0 | 0        | SMS   | INCOMING | Naxosard - KOHA                   |
| 354874102008620 | 923339999797 | 923335556550  | 2019-12-02 17:15:48.0 | 33       | VOICE | INCOMING |                                   |
| 354874102008620 | 923339999797 | 923335556550  | 2019-12-02 17:18:07.0 | 28       | VOICE | OUTGOING |                                   |
| 354874102008620 | 923339999797 | 923335556550  | 2019-12-02 17:29:13.0 | 56       | VOICE | INCOMING | Togn Bela - KOHA                  |
| 354874102008620 | 923339999797 | 923335556550  | 2019-12-02 17:34:32.0 | 63       | VOICE | OUTGOING | Togn Bela - KOHA                  |
| 354874102008620 | 923339999797 | 923348093577  | 2019-12-02 17:38:51.0 | 84       | VOICE | OUTGOING | Muleep abad - KOHA                |
| 354874102008620 | 923339999797 | 923348093577  | 2019-12-02 17:40:24.0 | 158      | VOICE | OUTGOING | Behzadi Chaker kot. - KOHA        |
| 354874102008620 | 923339999797 | 923335556550  | 2019-12-02 17:46:03.0 | 32       | VOICE | OUTGOING | Station Headquarters Kohat - KOHA |
| 354874102008620 | 923339999797 | 923335556550  | 2019-12-02 17:53:16.0 | 11       | VOICE | INCOMING | Garhi Muwaz Khan - KOHA           |
| 354874102008620 | 923339999797 | 923337557557  | 2019-12-02 17:54:07.0 | 36       | VOICE | OUTGOING | Garhi Muwaz Khan - KOHA           |
| 354874102008620 | 923339999797 | 923336666868  | 2019-12-02 18:14:33.0 | 19       | VOICE | OUTGOING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923336666868  | 2019-12-02 18:20:30.0 | 23       | VOICE | INCOMING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923336666868  | 2019-12-02 18:23:05.0 | 23       | VOICE | INCOMING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923336666868  | 2019-12-02 18:25:22.0 | 6        | VOICE | OUTGOING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923339634123  | 2019-12-02 18:37:14.0 | 26       | VOICE | INCOMING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923335556550  | 2019-12-02 18:41:29.0 | 89       | VOICE | OUTGOING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923368863183  | 2019-12-02 18:43:41.0 | 24       | VOICE | OUTGOING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923336666868  | 2019-12-02 19:59:22.0 | 23       | VOICE | OUTGOING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923339634123  | 2019-12-03 12:24:51.0 | 0        | SMS   | INCOMING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923336666868  | 2019-12-03 12:34:50.0 | 29       | VOICE | OUTGOING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923336666868  | 2019-12-03 12:35:45.0 | 47       | VOICE | OUTGOING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923335556550  | 2019-12-03 12:41:57.0 | 73       | VOICE | OUTGOING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923348093577  | 2019-12-03 12:45:03.0 | 0        | SMS   | INCOMING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923335556550  | 2019-12-03 12:46:27.0 | 0        | SMS   | INCOMING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 9233365672998 | 2019-12-03 12:47:26.0 | 0        | SMS   | INCOMING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923338561440  | 2019-12-03 13:02:04.0 | 115      | VOICE | OUTGOING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923339634123  | 2019-12-03 13:04:06.0 | 14       | VOICE | INCOMING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923368863183  | 2019-12-03 13:08:03.0 | 35       | VOICE | OUTGOING | Usmania Colony - KOHA             |
| 354874102008620 | 923339999797 | 923340538329  | 2019-12-03 13:16:38.0 | 0        | SMS   | INCOMING | Tensi Gate - KOHA                 |
| 354874102008620 | 923339999797 | 923349616677  | 2019-12-03 13:22:37.0 | 0        | SMS   | INCOMING | Tensi Gate - KOHA                 |
| 354874102008620 | 923339999797 | 923368863183  | 2019-12-03 13:30:25.0 | 44       | VOICE | OUTGOING | Tensi Gate - KOHA                 |
| 354874102008620 | 923339999797 | 923335556550  | 2019-12-03 13:32:28.0 | 34       | VOICE | OUTGOING | Tensi Gate - KOHA                 |
| 354874102008620 | 923339999797 | 923368863183  | 2019-12-03 13:40:58.0 | 42       | VOICE | OUTGOING | Tensi Gate - KOHA                 |
| 354874102008620 | 923339999797 | 923337557557  | 2019-12-03 14:02:46.0 | 51       | VOICE | INCOMING | Tensi Gate - KOHA                 |
| 354874102008620 | 923339999797 | 923368863183  | 2019-12-03 14:18:36.0 | 165      | VOICE | OUTGOING | Tensi Gate - KOHA                 |
| 354874102008620 | 923339999797 | 923368863183  | 2019-12-03 14:45:55.0 | 17       | VOICE | OUTGOING | Tensi Gate - KOHA                 |
| 354874102008620 | 923339999797 | 923340538329  | 2019-12-03 15:03:31.0 | 154      | VOICE | OUTGOING | Tensi Gate - KOHA                 |

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| CI             | A Number     | B Number     | Call Start Time  | Call End Time    | Call Duration | Call Type | Type  | Location - A                  |
|----------------|--------------|--------------|------------------|------------------|---------------|-----------|-------|-------------------------------|
| 51579111250980 | 923355556550 | 923377570809 | 03/12/2019 12:56 | 03/12/2019 12:57 | 21            | INCOMING  | VOICE | Sargah - KOHAT                |
| 51579111250980 | 923355556550 | 923345506365 | 03/12/2019 12:57 | 03/12/2019 12:58 | 15            | INCOMING  | VOICE | Sargah - KOHAT                |
| 51579111250980 | 923355556550 | 923345506365 | 03/12/2019 13:07 | 03/12/2019 13:08 | 64            | INCOMING  | VOICE | Check Post Hangu Road - KOHAT |
| 51579111250980 | 923355556550 | 923315971691 | 03/12/2019 13:16 | 03/12/2019 13:16 | 0             | INCOMING  | SMS   | Check Post Hangu Road - KOHAT |
| 51579111250980 | 923355556550 | 923369651718 | 03/12/2019 13:24 | 03/12/2019 13:25 | 49            | OUTGOING  | VOICE | Check Post Hangu Road - KOHAT |
| 51579111250980 | 923355556550 | 923306987605 | 03/12/2019 13:30 | 03/12/2019 13:31 | 47            | INCOMING  | VOICE | Check Post Hangu Road - KOHAT |
| 51579111250980 | 923355556550 | 923339999797 | 03/12/2019 13:32 | 03/12/2019 13:33 | 34            | INCOMING  | VOICE | Check Post Hangu Road - KOHAT |
| 51579111250980 | 923355556550 | 923365065370 | 03/12/2019 13:34 | 03/12/2019 13:34 | 12            | OUTGOING  | VOICE | Check Post Hangu Road - KOHAT |
| 51579111250980 | 923355556550 | 923059341954 | 03/12/2019 13:53 | 03/12/2019 13:53 | 0             | INCOMING  | SMS   | Garhi Muwaz Khan - KOHAT      |
| 51579111250980 | 923355556550 | 923059341954 | 03/12/2019 13:53 | 03/12/2019 13:54 | 22            | OUTGOING  | VOICE | Tehsil Gate - KOHAT           |
| 51579111250980 | 923355556550 | 923059341954 | 03/12/2019 14:06 | 03/12/2019 14:06 | 0             | INCOMING  | SMS   | Tehsil Gate - KOHAT           |
| 51579111250980 | 923355556550 | 923335090605 | 03/12/2019 14:07 | 03/12/2019 14:10 | 152           | OUTGOING  | VOICE | Tehsil Gate - KOHAT           |
| 51579111250980 | 923355556550 | 923335090605 | 03/12/2019 14:08 | 03/12/2019 14:08 | 0             | INCOMING  | SMS   | Tehsil Gate - KOHAT           |
| 51579111250980 | 923355556550 | 923306987605 | 03/12/2019 14:34 | 03/12/2019 14:37 | 148           | INCOMING  | VOICE | Check Post Hangu Road - KOHAT |
| 51579111250980 | 923355556550 | 923059341954 | 03/12/2019 14:59 | 03/12/2019 14:59 | 27            | OUTGOING  | VOICE | Check Post Hangu Road - KOHAT |
| 51579111250980 | 923355556550 | 923059341954 | 03/12/2019 15:07 | 03/12/2019 15:08 | 13            | OUTGOING  | VOICE | Oblan Camp - KOHAT            |
| 51579111250980 | 923355556550 | 923345506365 | 03/12/2019 15:09 | 03/12/2019 15:09 | 0             | INCOMING  | SMS   | Oblan Camp - KOHAT            |
| 51579111250980 | 923355556550 | 923339999797 | 03/12/2019 15:13 | 03/12/2019 15:14 | 55            | INCOMING  | VOICE | Oblan Camp - KOHAT            |
| 51579111250980 | 923355556550 | 923339999797 | 03/12/2019 15:28 | 03/12/2019 15:28 | 26            | INCOMING  | VOICE | Cantt Kohat - KOHAT           |
| 51579111250980 | 923355556550 | 923368863183 | 03/12/2019 16:01 | 03/12/2019 16:02 | 67            | INCOMING  | VOICE | Dhoda Rd Kohat - KOHAT        |
| 51579111250980 | 923355556550 | 923059341954 | 03/12/2019 16:09 | 03/12/2019 16:09 | 0             | INCOMING  | SMS   | Bus Stand - KOHAT             |
| 51579111250980 | 923355556550 | 923339999797 | 03/12/2019 16:09 | 03/12/2019 16:12 | 162           | INCOMING  | VOICE | Bus Stand - KOHAT             |
| 51579111250980 | 923355556550 | 923339999797 | 03/12/2019 16:17 | 03/12/2019 16:20 | 160           | INCOMING  | VOICE | Bus Stand - KOHAT             |
| 51579111250980 | 923355556550 | 923339617279 | 03/12/2019 16:21 | 03/12/2019 16:21 | 11            | INCOMING  | VOICE | Bus Stand - KOHAT             |
| 51579111250980 | 923355556550 | 923339655027 | 03/12/2019 16:25 | 03/12/2019 16:26 | 63            | OUTGOING  | VOICE | Miangan Colony - KOHAT        |
| 51579111250980 | 923355556550 | 923339999797 | 03/12/2019 16:30 | 03/12/2019 16:30 | 135           | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 51579111250980 | 923355556550 | 923364672541 | 03/12/2019 16:32 | 03/12/2019 16:32 | 19            | OUTGOING  | VOICE | Usmania colony - KOHAT        |
| 51579111250980 | 923355556550 | 923335090605 | 03/12/2019 16:56 | 03/12/2019 16:56 | 21            | INCOMING  | VOICE | Usmania colony - KOHAT        |
| 51579111250980 | 923355556550 | 923364672541 | 03/12/2019 16:58 | 03/12/2019 16:59 | 22            | INCOMING  | VOICE | Usmania colony - KOHAT        |
| 51579111250980 | 923355556550 | 923339617279 | 03/12/2019 17:14 | 03/12/2019 17:14 | 19            | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 51579111250980 | 923355556550 | 923339999797 | 03/12/2019 17:23 | 03/12/2019 17:24 | 36            | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 51579111250980 | 923355556550 | 923035141917 | 03/12/2019 17:33 | 03/12/2019 17:34 | 19            | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 51579111250980 | 923355556550 | 923035141917 | 03/12/2019 17:39 | 03/12/2019 17:40 | 63            | OUTGOING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 51579111250980 | 923355556550 | 923339623479 | 03/12/2019 18:13 | 03/12/2019 18:16 | 160           | INCOMING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 51579111250980 | 923355556550 | 923335090605 | 03/12/2019 18:17 | 03/12/2019 18:18 | 63            | INCOMING  | VOICE | Tehsil Gate - KOHAT           |
| 51579111250980 | 923355556550 | 923339999797 | 03/12/2019 18:48 | 03/12/2019 18:48 | 8             | INCOMING  | VOICE | Tehsil Gate - KOHAT           |
| 51579111250980 | 923355556550 | 923339999797 | 03/12/2019 18:57 | 03/12/2019 18:57 | 5             | INCOMING  | VOICE | Usmania colony - KOHAT        |
| 51579111250980 | 923355556550 | 923345506365 | 03/12/2019 19:57 | 03/12/2019 19:58 | 23            | OUTGOING  | VOICE | Usmania Colony - KOHAT        |
| 51579111250980 | 923355556550 | 923348266421 | 03/12/2019 20:01 | 03/12/2019 20:01 | 18            | OUTGOING  | VOICE | Usmania Colony - KOHAT        |

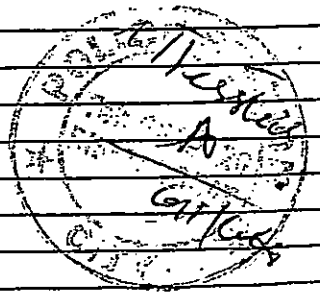
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12/12/19

|                 | A Number     | B Number     | Call Start Time  | Call End Time    | Call Duration | Call Type | Type  | Location - A                  |
|-----------------|--------------|--------------|------------------|------------------|---------------|-----------|-------|-------------------------------|
| 351579111250980 | 923355556550 | 923366661775 | 03/12/2019 20:29 | 03/12/2019 20:29 | 32            | INCOMING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923369651718 | 03/12/2019 21:27 | 03/12/2019 21:27 | 0             | INCOMING  | SMS   |                               |
| 351579111250980 | 923355556550 | 923355557550 | 03/12/2019 22:37 | 03/12/2019 22:37 | 9             | INCOMING  | VOICE | Tensil Gate - KOHAT           |
| 351579111250980 | 923355556550 | 923369651718 | 03/12/2019 22:46 | 03/12/2019 22:48 | 112           | OUTGOING  | VOICE | Tensil Gate - KOHAT           |
| 351579111250980 | 923355556550 | 923355557550 | 03/12/2019 23:53 | 03/12/2019 23:54 | 31            | INCOMING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923355557550 | 04/12/2019 0:48  | 04/12/2019 0:49  | 14            | OUTGOING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923355557550 | 04/12/2019 6:04  | 04/12/2019 6:05  | 55            | OUTGOING  | VOICE | Kohat - KOHAT                 |
| 351579111250980 | 923355556550 | 923339618676 | 04/12/2019 6:51  | 04/12/2019 6:52  | 17            | OUTGOING  | VOICE | Bus Stand - KOHAT             |
| 351579111250980 | 923355556550 | 923341904204 | 04/12/2019 7:05  | 04/12/2019 7:05  | 15            | OUTGOING  | VOICE | Bus Stand - KOHAT             |
| 351579111250980 | 923355556550 | 923341904204 | 04/12/2019 7:07  | 04/12/2019 7:08  | 24            | OUTGOING  | VOICE | Bus Stand - KOHAT             |
| 351579111250980 | 923355556550 | 923341904204 | 04/12/2019 7:12  | 04/12/2019 7:13  | 32            | OUTGOING  | VOICE | Bahdur Kot - KOHAT            |
| 351579111250980 | 923355556550 | 923363631313 | 04/12/2019 7:15  | 04/12/2019 7:17  | 130           | OUTGOING  | VOICE | Bahdur Kot - KOHAT            |
| 351579111250980 | 923355556550 | 923341904204 | 04/12/2019 7:22  | 04/12/2019 7:22  | 13            | OUTGOING  | VOICE | Behzadi Chiker kot. - KOHAT   |
| 351579111250980 | 923355556550 | 923341904204 | 04/12/2019 7:43  | 04/12/2019 7:45  | 143           | OUTGOING  | VOICE | Pir Khel - KOHAT              |
| 351579111250980 | 923355556550 | 923341904204 | 04/12/2019 7:46  | 04/12/2019 7:47  | 21            | OUTGOING  | VOICE | Pir Khel - KOHAT              |
| 351579111250980 | 923355556550 | 923369655393 | 04/12/2019 8:22  | 04/12/2019 8:22  | 0             | INCOMING  | SMS   | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923355557550 | 04/12/2019 9:06  | 04/12/2019 9:06  | 31            | OUTGOING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923339617279 | 04/12/2019 9:46  | 04/12/2019 9:46  | 22            | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923339617279 | 04/12/2019 10:03 | 04/12/2019 10:03 | 13            | OUTGOING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923329623477 | 04/12/2019 10:18 | 04/12/2019 10:20 | 125           | OUTGOING  | VOICE | Usmania colony - KOHAT        |
| 351579111250980 | 923355556550 | 923329623477 | 04/12/2019 10:18 | 04/12/2019 10:18 | 0             | INCOMING  | SMS   | Usmania colony - KOHAT        |
| 351579111250980 | 923355556550 | 923345506365 | 04/12/2019 10:21 | 04/12/2019 10:22 | 112           | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923339617279 | 04/12/2019 10:26 | 04/12/2019 10:27 | 25            | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923355557550 | 04/12/2019 10:29 | 04/12/2019 10:29 | 7             | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923341990045 | 04/12/2019 10:29 | 04/12/2019 10:29 | 0             | INCOMING  | SMS   | Usmania colony - KOHAT        |
| 351579111250980 | 923355556550 | 923339651811 | 04/12/2019 10:32 | 04/12/2019 10:33 | 58            | OUTGOING  | VOICE | Usmania colony - KOHAT        |
| 351579111250980 | 923355556550 | 923339617279 | 04/12/2019 10:33 | 04/12/2019 10:33 | 19            | INCOMING  | VOICE | Usmania colony - KOHAT        |
| 351579111250980 | 923355556550 | 923329623477 | 04/12/2019 10:37 | 04/12/2019 10:37 | 24            | INCOMING  | VOICE | Usmania colony - KOHAT        |
| 351579111250980 | 923355556550 | 923369651718 | 04/12/2019 10:47 | 04/12/2019 10:47 | 22            | INCOMING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923337557557 | 04/12/2019 10:52 | 04/12/2019 10:55 | 145           | INCOMING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923329623477 | 04/12/2019 10:55 | 04/12/2019 10:55 | 0             | INCOMING  | SMS   | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923329623477 | 04/12/2019 10:56 | 04/12/2019 10:56 | 43            | OUTGOING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923337557557 | 04/12/2019 11:00 | 04/12/2019 11:01 | 96            | INCOMING  | VOICE | Check Post Hangu Road - KOHAT |
| 351579111250980 | 923355556550 | 923355557550 | 04/12/2019 11:02 | 04/12/2019 11:03 | 19            | OUTGOING  | VOICE | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923329623477 | 04/12/2019 11:07 | 04/12/2019 11:07 | 41            | OUTGOING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923329623477 | 04/12/2019 11:11 | 04/12/2019 11:11 | 29            | INCOMING  | VOICE | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923339617279 | 04/12/2019 11:30 | 04/12/2019 11:30 | 33            | OUTGOING  | VOICE | Bus Stand - KOHAT             |
| 351579111250980 | 923355556550 | 923345506365 | 04/12/2019 11:36 | 04/12/2019 11:36 | 0             | INCOMING  | SMS   | Bus Stand - KOHAT             |
| 351579111250980 | 923355556550 | 923337557557 | 04/12/2019 11:36 | 04/12/2019 11:36 | 51            | INCOMING  | VOICE | Bus Stand - KOHAT             |

| A Number     | B Number     | Call Start Time  | Call End Time    | Duration | Call Type | Type  | Location  |
|--------------|--------------|------------------|------------------|----------|-----------|-------|---|
| 157911250980 | 923355556550 | 02/12/2019 0:08  | 02/12/2019 0:08  | 0        | NCCN VG   | SMS   | New Appara acade G-6/1 - ISLAMABAD                            |
| 157911250980 | 923355556550 | 02/12/2019 0:10  | 02/12/2019 0:10  | 0        | OUTGOING  | VOICE | New Appara acade G-6/1 - ISLAMABAD                            |
| 157911250980 | 923355556550 | 02/12/2019 7:27  | 02/12/2019 7:27  | 0        | OUTGOING  | VOICE | Aabpara - ISLAMABAD   |
| 157911250980 | 923355556550 | 02/12/2019 8:04  | 02/12/2019 8:04  | 0        | OUTGOING  | VOICE | New Appara acade G-6/1 - ISLAMABAD                            |
| 157911250980 | 923355556550 | 02/12/2019 10:05 | 02/12/2019 10:05 | 0        | INCOMING  | VOICE | New Appara acade G-6/1 - ISLAMABAD                            |
| 157911250980 | 923355556550 | 02/12/2019 10:47 | 02/12/2019 10:48 | 0        | INCOMING  | VOICE | New Appara acade G-6/1 - ISLAMABAD                            |
| 157911250980 | 923355556550 | 02/12/2019 11:12 | 02/12/2019 11:21 | 484      | INCOMING  | VOICE | New Appara acade G-6/1 - ISLAMABAD                            |
| 157911250980 | 923355556550 | 02/12/2019 11:51 | 02/12/2019 11:51 | 0        | OUTGOING  | VOICE | New Appara acade G-6/1 - ISLAMABAD                            |
| 157911250980 | 923355556550 | 02/12/2019 12:15 | 02/12/2019 12:15 | 0        | INCOMING  | SMS   | New Appara acade G-6/1 - ISLAMABAD                            |
| 157911250980 | 923355556550 | 02/12/2019 12:41 | 02/12/2019 12:42 | 82       | INCOMING  | VOICE | Sufi Rstrnt IT G-9 4 - ISLAMABAD                              |
| 157911250980 | 923355556550 | 02/12/2019 13:00 | 02/12/2019 13:03 | 158      | INCOMING  | VOICE | Tarnol - TARNOL   |
| 157911250980 | 923355556550 | 02/12/2019 13:06 | 02/12/2019 13:10 | 260      | OUTGOING  | VOICE | Tarnol - TARNOL   |
| 157911250980 | 923355556550 | 02/12/2019 13:27 | 02/12/2019 13:27 | 0        | INCOMING  | SMS   |   |
| 157911250980 | 923355556550 | 02/12/2019 13:29 | 02/12/2019 13:29 | 21       | INCOMING  | VOICE | Andor Kot - FATEHJANG   |
| 157911250980 | 923355556550 | 02/12/2019 13:46 | 02/12/2019 13:46 | 0        | INCOMING  | SMS   |   |
| 157911250980 | 923355556550 | 02/12/2019 13:50 | 02/12/2019 13:51 | 27       | INCOMING  | VOICE | FatehJang - FATEHJANG   |
| 157911250980 | 923355556550 | 02/12/2019 14:29 | 02/12/2019 14:29 | 0        | INCOMING  | SMS   | Domaille - DOMAILE  |
| 157911250980 | 923355556550 | 02/12/2019 14:46 | 02/12/2019 14:47 | 71       | OUTGOING  | VOICE | Village Rangli - VILLAGE RANGLI                               |
| 157911250980 | 923355556550 | 02/12/2019 15:12 | 02/12/2019 15:12 | 1        | INCOMING  | VOICE | Mohalla Takia - MOHALLA TAKIA                                 |
| 157911250980 | 923355556550 | 02/12/2019 15:13 | 02/12/2019 15:15 | 122      | OUTGOING  | VOICE | Mohalla Takia - MOHALLA TAKIA                                 |
| 157911250980 | 923355556550 | 02/12/2019 15:19 | 02/12/2019 15:20 | 34       | INCOMING  | VOICE | Mohalla Takia - MOHALLA TAKIA                                 |
| 157911250980 | 923355556550 | 02/12/2019 15:20 | 02/12/2019 15:22 | 98       | OUTGOING  | VOICE | Mohalla Takia - MOHALLA TAKIA                                 |
| 157911250980 | 923355556550 | 02/12/2019 15:47 | 02/12/2019 15:48 | 42       | INCOMING  | VOICE | Mohalla Takia - MOHALLA TAKIA                                 |
| 157911250980 | 923355556550 | 02/12/2019 16:08 | 02/12/2019 16:10 | 158      | INCOMING  | VOICE | Land between Mobilink Tpower and PTCL Exchange(Jhanda) - JAND |
| 157911250980 | 923355556550 | 02/12/2019 16:15 | 02/12/2019 16:16 | 49       | INCOMING  | VOICE | Khushalgarh - KHUSHALGARH                                     |
| 157911250980 | 923355556550 | 02/12/2019 17:15 | 02/12/2019 17:16 | 32       | OUTGOING  | VOICE | Babri Banda - BABRI BANDA                                     |
| 157911250980 | 923355556550 | 02/12/2019 17:18 | 02/12/2019 17:18 | 28       | INCOMING  | VOICE | Babri Banda - BABRI BANDA                                     |
| 157911250980 | 923355556550 | 02/12/2019 17:26 | 02/12/2019 17:26 | 39       | INCOMING  | VOICE | Togh Bala - KOHAT   |
| 157911250980 | 923355556550 | 02/12/2019 17:29 | 02/12/2019 17:30 | 56       | OUTGOING  | VOICE | Togh Bala - KOHAT   |
| 157911250980 | 923355556550 | 02/12/2019 17:32 | 02/12/2019 17:32 | 20       | INCOMING  | VOICE | Bahdur Kot - KOHAT  |
| 157911250980 | 923355556550 | 02/12/2019 17:34 | 02/12/2019 17:35 | 63       | INCOMING  | VOICE | Sector 2 college town - KOHAT                                 |
| 157911250980 | 923355556550 | 02/12/2019 17:42 | 02/12/2019 17:43 | 40       | INCOMING  | VOICE | Station Headquarters Konat - KOHAT                            |
| 157911250980 | 923355556550 | 02/12/2019 17:46 | 02/12/2019 17:46 | 32       | INCOMING  | VOICE | Tehsil Gate - KOHAT   |
| 157911250980 | 923355556550 | 02/12/2019 17:53 | 02/12/2019 17:53 | 11       | OUTGOING  | VOICE | Garhi Muwaz Khan - KOHAT                                      |
| 157911250980 | 923355556550 | 02/12/2019 17:55 | 02/12/2019 17:55 | 12       | OUTGOING  | VOICE | Usmania Colony - KOHAT  |
| 157911250980 | 923355556550 | 02/12/2019 17:59 | 02/12/2019 17:59 | 23       | OUTGOING  | VOICE | Usmania Colony - KOHAT  |
| 157911250980 | 923355556550 | 02/12/2019 18:03 | 02/12/2019 18:04 | 117      | OUTGOING  | VOICE | Usmania Colony - KOHAT  |
| 157911250980 | 923355556550 | 02/12/2019 18:09 | 02/12/2019 18:13 | 283      | OUTGOING  | VOICE | Usmania Colony - KOHAT  |

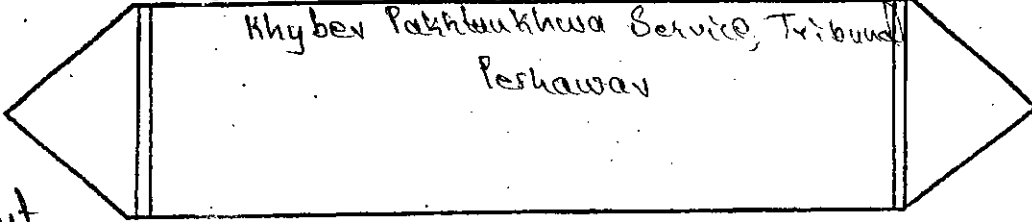
(3 has)

(0335-5556556)



| A Number        | B Number     | Call Start Time | Call End Time    | Call Duration    | Call Type | Type     | Location - P. |                               |
|-----------------|--------------|-----------------|------------------|------------------|-----------|----------|---------------|-------------------------------|
| 9111250980      | 923355556550 | 923345506365    | 02/12/2019 18:14 | 02/12/2019 18:14 | 6         | INCOMING | VOICE         | Usmania Colony - KOHAT        |
| 579111250980    | 923355556550 | 923325317113    | 02/12/2019 18:17 | 02/12/2019 18:21 | 241       | OUTGOING | VOICE         | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923315971691    | 02/12/2019 18:21 | 02/12/2019 18:21 | 0         | INCOMING | SMS           | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923345506365    | 02/12/2019 18:22 | 02/12/2019 18:29 | 395       | INCOMING | VOICE         | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923345506365    | 02/12/2019 18:36 | 02/12/2019 18:43 | 377       | INCOMING | VOICE         | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923339999797    | 02/12/2019 18:41 | 02/12/2019 18:42 | 89        | INCOMING | VOICE         | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923345506365    | 02/12/2019 18:43 | 02/12/2019 19:26 | 2577      | OUTGOING | VOICE         | Tehsil Gate - KOHAT           |
| 351579111250980 | 923355556550 | 923339634123    | 02/12/2019 19:20 | 02/12/2019 19:22 | 65        | INCOMING | VOICE         | Tehsil Gate - KOHAT           |
| 351579111250980 | 923355556550 | 923339999797    | 02/12/2019 20:18 | 02/12/2019 20:18 | 0         | INCOMING | SMS           | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923339634123    | 02/12/2019 20:20 | 02/12/2019 20:20 | 0         | INCOMING | SMS           | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923059341954    | 03/12/2019 7:34  | 03/12/2019 7:34  | 0         | INCOMING | SMS           | Tehsil Gate - KOHAT           |
| 351579111250980 | 923355556550 | 923355557550    | 03/12/2019 8:03  | 03/12/2019 8:04  | 21        | OUTGOING | VOICE         | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923315971691    | 03/12/2019 8:42  | 03/12/2019 8:42  | 25        | INCOMING | VOICE         | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923345506365    | 03/12/2019 8:59  | 03/12/2019 9:01  | 105       | OUTGOING | VOICE         | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923335090605    | 03/12/2019 9:04  | 03/12/2019 9:06  | 128       | INCOMING | VOICE         | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923369651718    | 03/12/2019 9:20  | 03/12/2019 9:24  | 287       | OUTGOING | VOICE         | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923335090605    | 03/12/2019 9:25  | 03/12/2019 9:25  | 0         | INCOMING | SMS           | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923335090605    | 03/12/2019 9:32  | 03/12/2019 9:37  | 328       | INCOMING | VOICE         | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923345506365    | 03/12/2019 9:37  | 03/12/2019 9:38  | 25        | OUTGOING | VOICE         | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923339617279    | 03/12/2019 9:43  | 03/12/2019 9:46  | 141       | INCOMING | VOICE         | Usmania Colony - KOHAT        |
| 351579111250980 | 923355556550 | 923345506365    | 03/12/2019 10:24 | 03/12/2019 10:28 | 214       | OUTGOING | VOICE         | Garhi Muwaz Khan - KOHAT      |
| 351579111250980 | 923355556550 | 923345506365    | 03/12/2019 10:30 | 03/12/2019 10:30 | 26        | INCOMING | VOICE         | Check Post Hangu Road - KOHAT |
| 351579111250980 | 923355556550 | 923345506365    | 03/12/2019 10:54 | 03/12/2019 10:55 | 59        | OUTGOING | VOICE         | Check Post Hangu Road - KOHAT |
| 351579111250980 | 923355556550 | 923339634123    | 03/12/2019 11:13 | 03/12/2019 11:13 | 14        | INCOMING | VOICE         | Check Post Hangu Road - KOHAT |
| 351579111250980 | 923355556550 | 923339651811    | 03/12/2019 11:29 | 03/12/2019 11:30 | 27        | OUTGOING | VOICE         | Check Post Hangu Road - KOHAT |
| 351579111250980 | 923355556550 | 923345506365    | 03/12/2019 11:32 | 03/12/2019 11:33 | 18        | INCOMING | VOICE         | Check Post Hangu Road - KOHAT |
| 351579111250980 | 923355556550 | 923345506365    | 03/12/2019 11:34 | 03/12/2019 11:35 | 25        | OUTGOING | VOICE         | Check Post Hangu Road - KOHAT |
| 351579111250980 | 923355556550 | 923345506365    | 03/12/2019 11:43 | 03/12/2019 11:43 | 9         | INCOMING | VOICE         | Tehsil Gate - KOHAT           |
| 351579111250980 | 923355556550 | 923345506365    | 03/12/2019 11:52 | 03/12/2019 11:52 | 20        | INCOMING | VOICE         | Tehsil Gate - KOHAT           |
| 351579111250980 | 923355556550 | 923345506365    | 03/12/2019 11:53 | 03/12/2019 11:54 | 21        | OUTGOING | VOICE         | Pir Khel - KOHAT              |
| 351579111250980 | 923355556550 | 923347515598    | 03/12/2019 11:54 | 03/12/2019 11:55 | 63        | INCOMING | VOICE         | Pir Khel - KOHAT              |
| 351579111250980 | 923355556550 | 923345506365    | 03/12/2019 11:55 | 03/12/2019 11:56 | 31        | INCOMING | VOICE         | Pir Khel - KOHAT              |
| 351579111250980 | 923355556550 | 923325753577    | 03/12/2019 12:29 | 03/12/2019 12:30 | 48        | OUTGOING | VOICE         | Tehsil Gate - KOHAT           |
| 351579111250980 | 923355556550 | 923325753577    | 03/12/2019 12:32 | 03/12/2019 12:34 | 21        | OUTGOING | VOICE         | Tehsil Gate - KOHAT           |
| 351579111250980 | 923355556550 | 923339999797    | 03/12/2019 12:41 | 03/12/2019 12:43 | 24        | INCOMING | VOICE         | Tehsil Gate - KOHAT           |
| 351579111250980 | 923355556550 | 923355557550    | 03/12/2019 12:43 | 03/12/2019 12:45 | 33        | INCOMING | VOICE         | Tehsil Gate - KOHAT           |
| 351579111250980 | 923355556550 | 923355557550    | 03/12/2019 12:46 | 03/12/2019 12:49 | 22        | INCOMING | VOICE         | Tehsil Gate - KOHAT           |
| 351579111250980 | 923355556550 | 923345106345    | 03/12/2019 12:50 | 03/12/2019 12:51 | 59        | OUTGOING | VOICE         | Tehsil Gate - KOHAT           |
| 351579111250980 | 923355556550 | 923345090605    | 03/12/2019 12:51 | 03/12/2019 12:52 | 37        | OUTGOING | VOICE         | Sangla - KOHAT                |

# بعدالت



Appellant 2 جناب Abdul Wahab Appellant موزخہ  
 Service Appeal بنام Vs IGP, KPK Respondent مقدمہ  
 # 3326/2026 Peshawar and others دعویٰ  
جرم

## باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
 آن مقام پشاور کیلئے اشرف علی خان علی خٹک سورج عمر  
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دینے جو جواب دہی اور اقبال دعویٰ اور  
 بصورت ڈگری کرنے اجراء اور صولی چیک دروپیا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برادگی اور منسوخی  
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار  
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ  
 پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائہ التوائے مقدمہ کے سبب سے وہ ہوگا۔  
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
 مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

Subscribed At

Signature

Attended & Accepted.  
 cell # 0332-9931876  
 BC # 10-4605  
 الرقم 26 ماہ جولائی 2021  
 واہ الع

مقام Peshawar کے لئے منظور ہے۔

Ali Bakht  
 Advocate Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.3326/2020

Abdul Wahab,  
Ex-Constable No.50.....Appellant.

Versus


The Inspector General of Police and others .....Respondents.

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Appellant

Through

  
Ashraf Ali Khattak  
Advocate,  
Supreme Court of Pakistan

  
Ali Bakht  
Advocate, Peshawar

& 

Sadia Umar  
Advocate, Peshawar

Dated: \_\_\_\_\_ / 07/ 2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

**Service Appeal No.3326/2020**

Abdul Wahab,  
Ex-Constable No.50.....Appellant.

Versus

The Inspector General of Police and others .....Respondents.

---

**REJOINDER ON BEHALF OF APPELLANT IN  
RESPONSE TO REPLY FILED BY RESPONDENTS.**

---

Respectfully Sheweth,

**Preliminary Objections:**

Preliminary objections raised by answering Respondents are erroneous and frivolous as having no factual and legal backing. The respondents have failed to show/explain as to how and why the appellant has no cause of action and locus standi ? How the appellant is estopped by his own conduct and what material facts, appellant has concealed from the notice of this Honourable Court ? How the appellant is not an aggrieved person within the meaning of Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 read with Rule 19 of the Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules, 2011 ? The respondent have also failed to explain as to how the instant service appeal is based on misconception of law and facts or bad in law ? The respondents have failed to raise any solid objection regarding the controversial question involved in the appeal. Since the preliminary objections are not supported by cogent and legal reason therefore, proper rejoinder could not be made and submitted. All the necessary parties have been duly arrayed as parties; question of mis-joinder and non-joinder of necessary parties cannot be raised.



So far the preliminary objection No. IV is concerned. In this respect, it is humbly submitted that respondent No.2 was under legal obligation to decide the appeal of the appellant within statutory period, but he failed to Honor his competency. Section 4 of KP Service Tribunal Act, 1974 provide that a Civil Servant aggrieved of any order shall prefer an appeal before KP Service Tribunal after lapse of 90 days of departmental appeal, if the departmental appeal was not decided within 90 days. Rule 19 of the KP Government (Efficiency and Discipline) Rules, 2011 provide that the Appellate authority shall not take any further action on the departmental appeal of the appellant, if the same is not decided within statutory period. The departmental appeal of the appellant was decided by respondent No.2 on 08-07-2020 i.e after lapse of about 06 months. On this score respondent No.2 was not competent to decide the departmental appeal of the appellant as per Rule 19 of the Rules cited *ibid*.

**Facts:-**

1. That reply to Para No.1 of the appeal is correct to the extent of lodging FIR No.1552 dated 05-12-2019 and whereas the remaining Para is incorrect hence denied. Appellant has neither been nominated in the FIR by the complainant nor any role whatsoever was brought by the I.O of the case, however he was later on called upon by the I.O to join investigation. Appellant joint investigation but he was exonerated by the I.O as no evidence was procured by the prosecution against the appellant which can connect him with the commission of the offence. The complainant and his son (alleged aductee) and other prosecution witness neither alleged any accusation against appellant nor any other witness has deposed any evidence against appellant. The case Diary No 14 dated 28-01-2020 and identification parade dated 17-12-2020 wherein appellant was completely exonerated by the complainant and IO are worth perusal. Appellant name is nowhere in column of accused. The final Challan is worth pcrusal. The Honorable Court completely vanished the entire criminal proceedings. Competent Court

of law even declared the criminal proceedings as illegal against the so called nominated accused and all accused were discharge by the competent court as there was no evidence. Order of the Court dated 10-10-2020 is worth perusal. The relevant record is attached as **Annexure-RJ/1**.

So far the departmental inquiry is concerned. In this respect, it is humbly submitted that inquiry officer without looking into the statements/depositions of the prosecution witnesses including the statement of IO (OF THE CRIMINAL CASE) has prepared/recorded the findings of the inquiry report in disregard of the evidence. The evidence recorded by the Inquiry Officer clearly establishes the fact that appellant is not involved in the case in any manner what so ever. The statement of prosecution witnesses are worth perusal. Moreover, it is also humbly submitted that Final Show Cause was served upon the appellant on 15-01-2020 requiring him to submit reply within 07 days of the communication of the Final Show Cause. It is worth mentioning that appellant was neither provided copy of the inquiry report with the final show cause nor with opportunity of personal hearing as per mandate of Rule 14 of E&D Rules, 2011. (**Annexure-RJ/II**)

So far the question of CDR is concerned, it has no evidentiary value in the eyes of law (Qanoon e Shahadat Order 1984 and Electronic Transaction Ordinance, 2002). Moreover the Inquiry Officer has not obtained the Cell record of the appellant. The question CDR belongs to one Farhad, who was also exonerated in relevant criminal proceedings and was discharged by competent Court of law. No statement either oral or documentary or cell conversation is available which can established any link of the appellant in so called abduction of the son of the complainant. The complainant herself and her son (alleged abductec) have exonerated the appellant from any sort of accusation and has categorically stated that appellant is not involved in the case. For the sake of arguments it is humbly submitted that if alleged

accused was in any manner involved in abduction of victim of criminal FIR No. 1592 dated 06-12-2019 then why Police exonerated him and why all accused were not only discharge by Investigating Officer but also discharged by the competent Court of law. Challan was submitted under section 169 Cr P C, which itself explain that Prosecution has no evidence.

Departmental proceeding were of Judicial nature and should have been initiated in accordance with the spirit of law.... Civil Servant has a right to have fair trial, which included appointment of an impartial and independent Inquiry Officer.

[2015 PLC (CS) 8].

**Grounds:**

- A. The reply to grounds A of the appeal is incorrect, hence denied. The answering respondents have admitted that they have no evidence against the appellant except CDR which itself is not evidence. Under what authority of law, the CDR could be termed as evidence. CDR is only information of contacts but does not show the conversations between the contactors. What was the conversation between the two persons are not known. In absence of record of conversation, how it can be presumed and said that the contact was for the purpose of commission of offence and conspiracy. Reliance is placed on 2021 SCMR 522

It is very astonishing that a person with whom appellant's cell contact has been shown has been discharge not only by the Investigation Officer of the Criminal Case but also discharged by the Competent Court of Law, being no evidence with prosecution to connect him with alleged offence; then how appellant was proved guilty.

- B. Reply to Para No.2 of the appeal by the answering respondents is incorrect, hence denied. Final Show Cause was served upon the appellant on 15-01-2020 with the directions to submit reply within 07

days of the communication of the Final Show Cause. Appellant was directed to submit reply within seconds which he submitted. Appellant was not provided inquiry report as per mandate of Rule 14 of E&D Rules, 2011. Appellant was also deprived of personal hearing as per mandate of Rule 14 and 15 of the Rules *ibid*.

Section 16 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 provides that a civil servant is liable for prescribed disciplinary action and penalties in accordance with prescribed procedure and not otherwise.

Rule 14 of KP Government Servant (E & D) Rules, 2011 provide that on receipt of inquiry report the competent authority shall examine the report and the relevant case material and determine;

- i. whether the inquiry has been conducted in accordance with prescribed procedure/provisions of E & D Rules?
- ii. Whether charges have been proved?

In the instant case the penal authority (respondent No.3) has not scrutinize the evidence on record, wherein all witnesses has categorically denied the involvement of appellant.

Since the appellant was not provided with the copy of Inquiry Report as per mandate of Rule 14 of E&D Rules, 2011; thus he was deprived from the opportunity of confronting with those pieces of evidence which were apparently going against him/appellant. The basic theme of legislatures behind the Final Show Cause was to afford the accused civil servant an opportunity to explain any evidence that apparently goes against him and that is why it is mandatory under Rule 14(4) to provide the accused Government employee a copy of inquiry report along with Final Show Cause. This is sort of proceedings under the analogy of Section 342 Cr.P.C. The Honorable Supreme Court of

Pakistan has laid down a law that where an accused is not confronted with those pieces of evidence which apparently goes against him shall be excluded from consideration.

Appellant was not provided copy of inquiry report as per mandates of rules 14 (C) of the Rules abid. Inquiry Report should be supplied to accused Civil Servant. [1993 PLC(CS) 10(e)+ 1992 PLC (CS) 751, 490+ 1990 SCMR 183+ 1996 SCMR 201+ 1983 PLC (CS) 473+ 1984 PLC (CS) 304+ 1989 PLC (CS) 359+ 2003 PLC (CS) 378+ 1986 PLC (CS) 459.

Appellant was also deprived from opportunity of personal hearing as per provision of Rule 14(5) and Rule 15 of the E&D Rules, 2011. Motive of the case is also not established.

**Burden of proof on the prosecution to prove the charge.**

The law in the country is still unchanged and is governed by law of Qanoon-e-Shahadat in Vogue and by virtue of the same, we have to see, that it is for the prosecution to establish the guilt of the person and if it fails to do so, the result is that benefit goes to the accused of the said failure.

If the allegation against the accused civil servant/employee is of serious nature and if he denies the same, a regular inquiry cannot be dispensed with. In such a case, the initial burden on the department to prove the charge, which cannot be done without producing evidence [1983 PLC (CS) 211 + 1997 PLC (CS) 817 (S.C) + 1997 SCMR 1543].

**Standard of proof.....To be akin to one required in criminal cases.**

It is significant that while referring to civil servant, who is being proceeded against under the Govt: Servant (Efficiency and Discipline) Rules the word "accused" has been used which indicates that the proceedings conducted by the inquiry officer are akin to a criminal trial [1996 SCMR 127]. A person is presumed to be guilty of misconduct if evidence against him establishes his guilt. The use of the word "guilty" is indicative of the fact that the standard of proof should be akin to one required in criminal cases [ PLD 1983 SC (AJ & K) 95].

**Prosecution to stand on its legs to prove the allegations.**

Accused is stated to be a favorite child of law and he is presumed to be innocent unless proved otherwise and the benefit of doubt always goes to the accused and not to the prosecution as it is for the prosecution to stand on its own legs by proving all allegations to the hilt against the accused. Mere conjectures and presumption, however strong, could not be made a ground for removal from service of civil servant [1999 PLC (CS) 1332 (FST)].... Unless and until prosecution proves accused guilty beyond any shadow of doubt, he would be considered innocent [1983 PLC (CS) 152 (FST)].

Re-instated employee would be entitled to back benefits as a matter of course unless employer is able to establish by cogent evidence that concerned employee had been gainfully employed elsewhere. In this respect, initial burden would lie upon the employer and not upon the employee to prove that such employee was gainfully employed during period of termination from his service. 2010 TD (Labour) 41.

Civil servant who was dismissed from service through arbitrary and whimsical action of the government functionaries and re instated through judicial order of Service Tribunal would have every right to recover arrears of salaries by way of back benefits due to them during the period of their dismissal and re instatement. It would be very unjust and harsh to deprive them of back benefits for the period for which they remained out of job without any fault on their part and were not gainfully employed during that period.....Supreme Court allowing their appeal and directing payment of back benefits to the appellant. 2006 T D (SERVICE) 551 (a).

When facts and circumstances of the criminal case and disciplinary proceeding are the same..... Civil Servant entitle for re-instatement... (2011 TD 164). Acquittal from criminal charge. Re-instatement is a Rule under Article 4 and 25 of the Constitution, 1973. 1997 PLC (CS) 752.

Dismissal... Registration of FIR... Acquitted... Such dismissal could not be insisted to be retained in field (2009 PLC (CS) 471, 1986 PLC (CS) 130.

Civil Servant was proceeded against on the statement of compliant before Police. Complainant resiled from his statement during the course of Criminal Proceedings and Civil Servant was acquitted of the charge level against him, but in departmental proceeding he was dismissed from service on the basis of complainant statement before the police. Statement of complaint has been recorded before the police

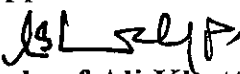
and the same could not be used in departmental proceeding and more so the same has not scrutinized through the scrutiny of cross examination, therefore has no evidently value. Civil Servant was re instated, 2003 SCMR 207+ 2013 PLC (CS) 1059+ 2013 SCMR 714:

C to M:- Reply to grounds C to M are mere repetition of facts/grounds which have already been responded. Appellant rely on grounds mentioned memo of appeal and would like to seek the permission of this Honorabe Tribunal to advance/share grounds in rebuttal.

It is, therefore, humbly prayed that the reply of answering Respondents may graciously be rejected and the appeal as prayed for may graciously be accepted by re-instating the appellant on his original service with all back benefits.

  
Appellant

Through

  
Ashraf Ali Khattak  
Advocate,  
Supreme Court of Pakistan

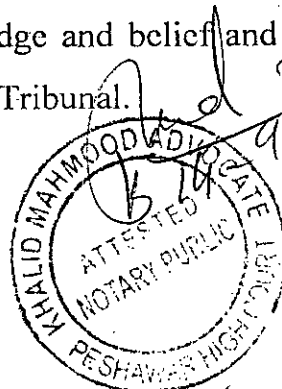
  
&  
Ali Bakht  
Advocate, Peshawar

  
&  
Sadia Umar  
Advocate, Peshawar

Dated: \_\_\_\_\_ / 07/ 2021

Affidavit

I, Abdul Wahab, Ex-Constable No.50, do hereby affirm and declare on oath that the contents of this rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



  
Deponent







12

**IN THE COURT OF TARIQ ABBAS SENIOR CIVIL JUDGE/JUDICIAL  
MAGISTRATE U/S 30 Cr.PC, KOHAT**

**Statement u/s 164 Cr.PC.**

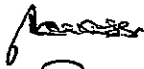
Statement of Muhammad Ali aged about 14/15 years s/o Israr Khan r/o Mohallah Mian Badshah Kohat City u/s 164 Cr.PC, on oath

Stated that on 03.12.2019 at 16:30 I was present at my home, someone knocked out door. my mother directed me to open the door, on which I came out from my house and saw two persons in police uniform, whereas two other persons in plain dress were sitting in a white colour vitz motorcar. The persons in police uniform told me that the SHO is waiting for me in the motorcar and calling you, on which I went near the motorcar. The persons in police uniform pushed me inside the car and boarded me in the motorcar and muffled my face, due to which I could not see anything. They used to speak in Hindko, Pashto and Urdu languages with each other. They asked me to inform my father to arrange Rs. 10000000/-. Thereafter they deboarded me from the motorcar in a village at about 10:00 PM on a deserted road side. I removed mask and on query came to know that this village is Dhoda Sharif. In the meanwhile a motorcar came there, in which two persons were sitting, I requested them to drop me in the city, and narrated them the whole story. From their mobile I contacted my father, and two persons also talked with my father on mobile. The two persons dropped me at police station city, where my father also reached, and we reported the matter to the local police. As I was forcefully abducted and wrongfully confined by those four unknown persons, therefor I charge them for the commission of said offence. I can identify them if they appear before me. I am requesting that my case be registered against the unknown four accused.

Certified u/s 364 Cr.PC

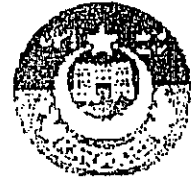
RO & AC  
05.12.2019

Ali  
Muhammad Ali

  
**Tariq Abbas**  
Senior Civil Judge/Judicial  
Magistrate u/s 30 Cr.P.C, Kohat

**Senior Civil Judge**  
Judicial Magistrate Kohat

ANX-RJ/2



13

از دفتر سپرٹنڈنٹ آف پولیس انوسٹی گیشن ونگ کوہاٹ

FAX NO. 0922-9260275  
Phone No. 0922-9260274  
Email. mvlab2@gmail.com

نمبر 46/2019 مورخہ 12/12/2019

منجانب: سپرٹنڈنٹ آف پولیس انوسٹی گیشن ونگ کوہاٹ

بجانب: ڈسٹرکٹ پولیس آفیسر کوہاٹ

عنوان: براگرس رپورٹ مقدمہ عدلت 1593 مورخہ 205.12.2019 PPC 365 تھانہ شی۔

- نام:
- 1- فرہاد ولد نصر اللہ سکے محلہ مہاں بادشاہ کوہاٹ۔
  - 2- زبیر ولد ریاض سکے محلہ مہاں بادشاہ کوہاٹ۔
  - 3- تقیانی ولد محمد شفیق سکے محلہ مہاں بادشاہ کوہاٹ۔

Appellant name is  
no where ?

محمد علی / منوی

سماة فاطمہ

جناب عالی

مدعیہ مقدمہ مورخہ 03.12.2019 کو بوقت 17:00 بجے بحاضری تھانہ آ کر یوں رپورٹ کی۔ کہ امر روز عصر ویلہ خانہ خود میں موجود تھی۔ بوقت 16:30 بجے گھر کے دروازے پر دستک ہوئی۔ جب اس نے دروازہ کھولا تو ایک جوان جس نے پولیس وردی پہنی ہوئی تھی۔ اور چہرہ پر ماسک پہنا ہوا تھا۔ اسے کہا کہ گھر میں کوئی مردہ ہوتا ہے جو جس براس نے پیراش محمد علی کو کہا کہ باہر پولیس آئی ہوئی ہے جا کر دیکھیں۔ وہ گھر کے دروازے میں کھڑی تھی۔ پیراش محمد علی مذکورہ پولیس وردی میں ملبوس شخص موٹر کار ڈیڈیز برنگ سفید نمبر نامعلوم میں بیٹھا کر اسے کہا کہ ہم اس سے کسی گھر کا پتہ پوچھتے ہیں۔ اور چلے گئے اس بابت معلوم کرنے والا ہوں کہ اس کے بیٹے کو پولیس کون سے سٹیشن لے گئے ہیں اطلاع رپورٹ کی۔

4:30 PM

Husband of complainant

دوران رپورٹ کی اسرار خان ولد نثار خان خاندان سماة فاطمہ گل مدعیہ حاضر تھانہ آ کر جس نے بتلایا کہ عرصہ تقریباً 8 ماہ قبل

اس نے اپنی اراضی 28 مرلہ واقع ڈھیری بانڈہ فرہاد ولد نصر اللہ سکے گزنی ڈھوڑا بازار برسلز 95 لاکھ روپے پر فروخت کی تھی۔ جس نے تاحال رقم

وصول نہیں کی ہے اور جب بھی وہ فرہاد سے رقم کا مطالبہ کرتا ہے تو ناٹال منول اور تعلقات ختم کرنے کا کہہ دیتے ہیں اب اسے شک ہے کہ اس کے بیٹے

کو بذریعہ پولیس وردی میں ملبوس کسان اٹھا کر لے گئے ہیں اور اپنی مضموم عزائم حاصل کرنا چاہتے ہے سر دست اطلاع رپورٹ کر کے جو بحوالہ مد

36 روز نامہ 03.12.2019 درج روز نامہ ہو کر عظمت خان ASI انچارج چوکی تحصیل پوسٹ نے حسب ہدایت افسران (III) 156 ضف

شروع کر کے حسب نشاندہی مدعیہ نقشہ موقع مرتب کی ہے۔ موقع کے نزدیک النور پبلک سکول پر نصب شدہ کیمروں میں وقوع کے مناظر موجود پا کر جو

بذریعہ USB محفوظ کر کے بردے فرد قبضہ پولیس کی گئی ہے۔ اور اسی طرح منوی علی ابراہم عرف محمد علی بوقت 22:50 بجے رات تھانہ شی آ کر بیان کیا

کہ بروز وقوعہ گھر میں موجود تھا۔ والدہ کی آواز پر اس نے دروازہ کھولا تو سامنے دو کسان پولیس ذردیوں میں ملبوس اور دو کسان سادہ کپڑوں میں

کھڑے موٹر کار ڈیڈیز برنگ سفید بلا نمبر میں بیٹھا کر اس دوران ایک شخص پولیس وردی میں مجھ سے کہا کہ SHO بلا رہا ہے اور مجھے دھکا دے کر گاڑی

میں بیٹھایا اور میرے چہرے پر ماسک پہنایا۔ ماسک کی وجہ سے مجھے آگے کچھ نہیں دیکھ رہا تھا اور یہ کسان اردو، پشتو اور ہندکو زبان میں باتیں کر رہے

تھے اور کچھ مختلف گاڑیوں میں اتار بیٹھا ہے تھے۔ جس میں ایک شخص نے مجھ سے کہا کہ میری والدہ سخت بیمار ہے اور اپنی والدہ کو کہہ دے کہ ایک کروڑ

روپے کا بندوبست کرے۔ ورنہ آئندہ ایسا نہیں چھوڑیں گے۔ کافی وقت گزرنے کے بعد آخر کار ایک گاڑی میں گاڑی سے اتار کر خود چلے گئے۔ میں

نے ماسک چہرے سے ہٹایا رات کا وقت تھا نزدیک موجود لوگوں سے معلوم ہوا کہ یہ گاڑی ڈھوڑہ شریف ہے۔ اس دوران ایک موٹر کار آ کر کھڑا کرنے

کا اشارہ دیا جس میں دو کسان سوار تھے موٹر کار میں موجود کسان کی موبائل پر اپنے والد اسرار کے ساتھ بات کر کے نے مجھے تھانہ شی لے آیا۔ جس کی

16-50 PM

رپورٹ پر مدد 36 روز نامیچہ 03.12.2019 درج روز نامیچہ کر کے عظمت خان ASI نے محمد علی کا بیان زیر دفعہ 161 ض ف قلمبند کر کے مورخہ 05.12.2019 کو عدالت میں زیر دفعہ 164 ض ف قلمبند کر کے جس پر مقدمہ علت 1593 مورخہ 05.12.2019 PC تھانہ شی درج رجسٹر کر کے بغرض تفتیش مہیا OII/ASI کو حوالہ کر کے ابتدائی رپورٹ میں مدعیہ مسماۃ فاطمہ گل بی بی اور اس کے خاندان سراسر خان نے فرہاد ولد نصر اللہ سکندر گڑھی ڈھوڈیوال پر شک ظاہر کی ہے۔ کسی فرہاد کے موبائل نمبر 0333-9999797 کے CDR حاصل کر کے پڑتال CDR پر کسی فرہاد بروز وقوعہ وقوعہ سے قبل اور بعد میں مسلمان زبیر ولد ریاض، قذافی ولد محمد شفیق ساکنان گڑھی ڈھوڈیوال، شہزاد ولد صالحین سکندر حافظ آباد، آیات اللہ خان تھانہ کینٹ اور اس کے گنر کانٹینیل عبدالوہاب، محمد عابد کے ساتھ رابطے بار بار کی گئی ہے۔ مسلمان زبیر، قذافی جبکہ شہزاد، فرہاد آپس میں پراپرٹی پارٹنر ہیں اور اس طرح زبیر، قذافی، آیات اللہ خان SHO کانٹینیلان عبدالوہاب، محمد عابد کے CDR بھی حاصل کر کے کسی فرہاد کے ساتھ بار بار رابطے ہوئے ہیں۔

اس سلسلہ میں کانٹینیلان عبدالوہاب، محمد عابد اور آیات اللہ SHO کو طلب کر کے شامل تفتیش کر کے اشارو گیٹ کرنے پر کانٹینیل عبدالوہاب نے بتایا کہ وہ بروز وقوعہ مورخہ 03.12.2019 کو صبح سے لے کر شام تک SHO آیات اللہ خان کے ساتھ ڈیوٹی پر تھا۔ کانٹینیل محمد عابد کو اشارو گیٹ کر کے بتلایا کہ 26.11.2019 سے آیات اللہ خان SHO نے زبانی چھٹی دی تھی اور مورخہ 03.12.2019 کو وہ گھر واقع کوہاٹی ڈھوک ملی تنگ سے سبزی منڈی کی ایک خمام داڑھی اور سر کے بال بنوانے اور شام کو اپنے موٹر سائیکل براستہ تحصیل گیٹ میاں نیل بازار، پرائمری صدر تھانہ روڈ کو جانا بیان کیا۔ اور اپنا موبائل تھانہ بھول جانا بیان کیا۔ اسی طرح آیات اللہ خان SHO نے بتلایا کہ وہ کسی فرہاد سے کسی انفر کو کھل مانگے تھے اور کئی دفعہ اس بابت فرہاد، شہزاد کے ساتھ اپنے موبائل پر رابطے کئے ہیں۔ اور مسلمان فرہاد، شہزاد نے بھی آیات اللہ خان کے ساتھ کئے ہیں۔ اور ان کے کہنے پر بھی کانٹینیل عبدالوہاب، شہزاد وغیرہ کے ساتھ رابطے کئے ہیں۔ اور شہزاد سے تھانہ کینٹ کھل وغیرہ پہنچائے تھے۔ کسی فرہاد ولد نصر اللہ، زبیر ولد ریاض، قذافی ولد محمد شفیق کو مقدمہ ہذا میں چارج کر کے طرمان ٹھہرائے گئے ہیں اور کسی فرہاد ولد نصر اللہ نے عدالت ASJ-IV صاحب سے قبل از گرفتاری ضمانت کروا کر جس میں 19.12.2019 مقرر تھی۔ مدعیہ مسماۃ فاطمہ گل اور اس کا خاندان سراسر خان نے ان کے ساتھ عدالت میں پیش ہو کر بقاعدہ شامپ پیپر تحریر کر کے کہ ہم کسی پرو عویداری نہیں کرتے ہیں۔ فرہاد کا BBA کنفرم ہوا اور بقایا کسان زبیر اور قذافی نے بھی BBA کروا کر جس میں تاریخ کنفرمیشن 06.01.2020 مقرر ہے۔

مدعیہ اور مغوی محمد علی سے موٹر کار وینڈوز برنگ سفید نمبر نام معلوم کی شناخت کر کے انہوں نے بتلایا کہ وہ موٹر کار وینڈوز نہیں ہے۔ جہاں تک تفتیش پایا جاتا ہے وہ دست پویس CDR کے علاوہ کوئی ثبوت نہیں مل رہا ہے اور مدعیہ مقدمہ بھی کسی پرو عویداری کرنے کو تیار نہیں ہے۔ صرف اور صرف پویس کے کندھوں پر بندوق چلا رہا ہے۔ پراگرس رپورٹ عرض ہے۔

پیر سٹڈنٹ آف پولیس انوشی کیشن ونگ کوہاٹ

Appellant نے contact کٹ ہے، کسی مقصد کے تحت کیس Prosecution میں یہ ثابت نہیں ہے۔ کسی مقصد کے تحت کیس has to prove.

CDR  
نہاکی پولیس انفر  
پر کوئی قانونی  
پابندی ہے کہ  
وہ کسی شہری

جولائی CDR - جولائی کا Attach کیا -

کو کال نہیں کر سکتے یہ وہ کہہ کر کال کی کال

النم = eventful day  
i.e. the day of occurrence.

Public d  
S-C Judgment -  
2021 SCMR 322

بیان ازان انور شاہ Oll تھانہ شی کوہاٹ

جناب عالی

15

شیطان کی بنیاد پر امر اور  
نہی کا انکار اور ایسی باتوں کا  
تعمیر و ترمیم

بیان کرتا ہوں کہ مورخہ 03.12.2019 مدعیہ مسماة فاطمہ گل زوجہ اسرار خان سکنہ گڑھی ڈیوڈ وال نے اپنے پسر اش محمد علی کے لاپتہ ہونے، نامعلوم ملزمان رپورٹ کر کے رپورٹ میں انہوں نے شک ظاہر کیا تھا کہ سہمی فرہاد گل ولد نصر اللہ خان سکنہ گڑھی ڈیوڈ وال پر 28 مہر لہ اراضی واقع ڈھیری بانڈہ مبلغ 95 لاکھ روپے فروخت کیا تھا جب اسے مذکورہ فرہاد سے رقم کا مطالبہ کرتا ہے تو مذکورہ اسکے ساتھ تعلقات ختم کر دیتا ہے اور رقم دینے میں نال منول سے کام لے رہا ہے۔ اسے شک ہے کہ اسکے بیٹے محمد علی کو نامعلوم کسان پولیس وردی میں ملبوس کہیں لے گئے ہوں۔ جس کی رپورٹ بحوالہ مد 26 روز نامہ 03.12.2019 تھانہ شی درج روز نامہ کے جس پرائمری (iii) 156 شروع کرنے عظمت خان ASI انچارج چوکی تحصیل پوسٹ نے انکوائری شروع کر کے بدوران انکوائری مغوی محمد علی ولد اسرار خان بازیاب ہو کر خود بخود تھانہ حاضر آکر جسکا بیان زیر دفعہ 161 ضف لیا جا کر بعد میں عدالت میں بیان زیر دفعہ 164 ضف قلمبند کر کے انہوں نے بھی نامعلوم ملزمان جس میں دو کسان پولیس وردی میں ملبوس اور چہروں پر ماسک پہنے ہوئے تھے، دعویداری کی۔ بعدہ مورخہ 05.12.2019 کو مقدمہ درج رجسٹر ہو کر بغرض تفتیش من Oll حوالہ ہو کر بدوران تفتیش مذکورہ فرہاد کا موبائل (0333-9999797) کا ڈیٹا حاصل کر کے مذکورہ نے وقوع سے قبل اور وقوع کے روز موبائل نمبر 0332-9770151، 0334-8287677، 0333-9634123، 0336-8863183، 0335-5556550، 0336-3631313 پر رابطہ ہوئے ہیں جن کے بھی CDR حاصل کر کے جبکہ موبائل نمبری 0335-5556550 تھانہ ذوالی ولد محمد شفیق اور موبائل نمبری 0336-8863183 زیر ولد ریاض ساکنان گڑھی ڈیوڈ وال اور موبائل نمبر 0336-3631313 ملک شہزادہ ولد صالحین سکنہ حافظ آباد کے نام پر ہے اور اسی طرح موبائل نمبر 0333-9634123 آیت اللہ (سابقہ SHO تھانہ کینٹ) جبکہ موبائل نمبر 0334-8287677 کا نشیمل عبدالوہاب اور موبائل نمبری 0332-9770151 کا نشیمل محمد عابد کے نام پر ہیں۔ مذکورہ آیت اللہ خان SHO اور کانسٹیبلان محمد عابد عبدالوہاب کو مقدمہ ہذا میں شامل تفتیش کر کے مقدمہ میں انٹار ڈیکٹ کر کے SHO آیت اللہ خان نے بتلایا کہ وہ بروز وقوع سے قبل اور وقوع کے بعد سہمی فرہاد اور ملک شہزادہ کے ساتھ ذاتی کام کے سلسلے میں بات چیت کی تھی اور اسی طرح کا نشیمل عبدالوہاب نے بھی SHO صاحب کے کہنے پر بات چیت کی ہے۔ کا نشیمل محمد عابد بروز وقوع سے لیکر تقریباً شام تک SHO صاحب کے ساتھ موجود تھا۔ شام کے بعد اپنی موٹر سائیکل پر راستہ تحصیل گیٹ، میاں خیل بازار اور پرانا تھانہ صدر روڈ اپنے گھر خود جانا بیان کیا۔ اسی طرح مدعی مقدمہ اور مغوی محمد علی کو بھی تھانہ طلب کر کے موٹر کار Vitz نمبر نامعلوم برنگ سفید جو تھانہ صدر کا مال مقدمہ تھا۔ SHO آیت اللہ خان تھانہ کینٹ کے زیر استعمال میں تھا۔ موٹر کار کو UMT میں مدعیہ مسماة فاطمہ گل بی بی و مغوی محمد علی کو دکھلایا۔ مغوی محمد علی نے اصرار کیا کہ اسکے آنکھوں پر پٹی باندھ کر گاڑی میں بیٹھا کر اور گاڑی میں چکر دیں تاکہ میں گاڑی کی صحیح شناخت کر سکوں۔ مغوی کے کہنے پر مغوی بمعدہ مدعیہ بمعدہ ہیڈ کا نشیمل عقیل حسین و کا نشیمل مقبول حسین، من Oll نے گاڑی میں بیٹھ کر گاڑی کو MT سے نکال کر ہنگو پھا ٹک، ہنگو پھا ٹک سے بائی پاس روڈ پشاور، OTS روڈ پر واپس MT آ کر مغوی نے بتلایا کہ یہ گاڑی نہیں ہے جس میں مجھے اغوا کیا تھا۔ اس گاڑی میں ڈرائیور اور فرنٹ سیٹ کے درمیان ہاتھ سپورٹر اور پیچھے سیٹ میں سفٹی بیلت نہیں تھا جبکہ اسی گاڑی میں موجود ہے۔ مذکورہ مدعیہ مغوی سے فرد شناخت موٹر کار بھی علیحدہ مرتب کی گئی ہے۔ چونکہ سہمی فرہاد اور دیگر کسان زیر دفعہ ذوالی کو مقدمہ ہذا میں اپنی طرف سے چارج کر کے پروانہ نامزدگی ملزمان بھی جامدی کی گئی ہے۔ مذکورہ کسان نے عدالت ASJ-IV سے ضمانت قبل از گرفتاری کروا کر تاریخ پیشی پر مدعیہ مسماة فاطمہ گل بی بی و مغوی محمد علی اور مدعیہ کا خاندان محمد اسرار پیش ہو کر باقاعدہ مشاہدہ پیش کیا۔ مذکورہ پر کسی قسم کی دعویداری نہیں کی چونکہ مقدمہ میں مدعی پہلے سے موجود ہے۔ پولیس کسان صرف اور صرف فرہاد اور دیگر کسان کے ساتھ صرف بات چیت کی گئی ہے اور مغوی کو Vitz موٹر کار بھی دکھایا گیا ہے اور کانسٹیبلان کا بھی شناخت کر کے مدعیہ اور مغوی نے پولیس اہلکاران کو شناخت نہیں کیا ہے کہ یہ نہیں ہیں۔ تفتیش سے نامزد ملزمان کے علاوہ پولیس اہلکاران کے خلاف کوئی ٹھوس ثبوت دستیاب نہیں ہوا۔ یہی میرا بیان ہے جو حقیقت پر مبنی ہے۔

FUR  
16:30  
4:30  
PM  
↓  
22:30  
10:30  
بازیاب

جولائی

بندوں کی  
شناخت  
کا طریقہ  
شناخت  
Motive

Appellant

دستخط

- 1) Father of abductee.  
2) Husband of complainant

بیان ازان اسرار خان ولد ثار خان سکنہ محلہ گڑھی مواز خان کوہاٹ

شناختی کارڈ نمبر 9-14301-2061087 موبائل نمبر 0333-9626771

حلفاً بیان کرتا ہوں کہ مورخہ 03.12.2019 بوقت 16:30 بجے میں اپنی دکان واقع گڑھی مواز خان چوک میں موجود تھا کہ موبائل فون پر زوجہ ام نے فون کر کے بتایا کہ کسی نے ہمارے گھر کا دروازہ کھٹکھٹایا۔ جب میں نے دروازے میں لگی دوئین سے جھانک کر دیکھا تو باہر ایک موٹر کار برنگ سفید Vetz کھڑی تھی۔ کوئی شخص موٹر کار کے نزدیک نہیں تھا جس کے شیشے کالے رنگ کے تھے۔ میں نے دروازہ کھول کر باہر دیکھا تو باہر دروازے کے سائیڈ پر خاک کی پینٹ اور کالی شرٹ میں ملبوس پولیس اہلکار کھڑا تھا۔ جو سلج کلاشنکوف تھا، نے کہا کہ گھر میں کوئی مرد موجود ہو تو باہر بھیجا دو ان سے کچھ ضروری معلومات کرنی ہے۔ میں نے بجوا کہا کہ اس وقت میرا بیٹا گھر پر موجود ہے اس کو بھیجا تا ہوں۔ جب بیٹے کو باہر بھیجا تو متعلقہ پولیس وردی میں ملبوس شخص نے میرے گھر کا مین گیٹ دروازہ باہر سے بند کر دیا۔ جملہ حالات میں گھر کے گیٹ میں لگے ہوئے دوئین سے دیکھ رہی تھی کہ میرے بیٹھے کو گاڑی کی پچھلی سیٹ میں سوار کر لے گئے اور گاڑی جروئنڈہ سائیڈ کی طرف لے گئے۔ میں نے زوجہ ام کو کہا کہ تھوڑا صبر کرو شاید یہیں کہیں گیا ہو آجائیگا۔ لیکن میرے زوجہ نے اپنے بھائی کو فون کر کے کہا کہ میرا خاوند مصروف ہیں لہذا آپ جائیں تاکہ مقامی تھانہ میں رپورٹ کریں۔ مقامی پولیس نے رپورٹ پر کارروائی کرتے ہوئے اپنی تلاش شروع کی اور باقاعدہ CCTV کیمرے وغیرہ چیک کیے۔ ہم رات کو تھانہ میں موجود تھے کہ ایک نامعلوم نمبر سے کال آئی کہ آپ کہاں ہے آپ کا بیٹا ہمارے پاس ہے۔ اس کے بعد وہی موٹر کار والوں نے میرے بچے کسی محمد علی کو تھانہ لے کر آگئے۔ ملزمان میری زوجہ ام وقوعہ کی چشم دید ہے اور سامنے آنے پر شناخت کر سکتی ہیں۔

یہی میرا بیان ہے جو حقیقت پر مبنی ہے۔

تحریر: 06.01.2020

Mottue

بیان مسماة فاطمہ گل زوجہ اسرار خان سکنہ گڑھی عطا خان محلہ میاں خیل  
شناختی کارڈ نمبر 4-1574411-14301 موبائل نمبر

حلفاً بیان کرتا ہوں کہ مورخہ 03.12.2019 بوقت 16:30 بجے کسی نے میرے گھر کا دروازہ کھٹکھٹایا۔  
جب میں نے دروازے میں لگی دوئین سے جھانک کر دیکھا تو باہر ایک موٹر کار برنگ سفید Vetz کھڑی تھی۔ کوئی شخص موٹر کار کے  
نزدیک نہیں تھا جس کے شیشے کا لے رنگ کے تھے۔ میں نے دروازہ کھول کر باہر دیکھا تو باہر دروازے کے سائڈ پر خاکی پینٹ اور  
کالی شرٹ میں ملبوس پولیس اہلکار کھڑا تھا۔ جو مسلح کلاشنکوف تھا، نے کہا کہ گھر میں کوئی مرد موجود ہو تو باہر بھیجا دو ان سے کچھ ضروری  
معلومات کرنی ہے۔ میں نے بجوایا کہا کہ اس وقت میرا بیٹا گھر پر موجود ہے اس کو بھیجا تا ہوں۔ جب بیٹے کو باہر بھیجا تو متعلقہ  
پولیس وردی میں ملبوس شخص نے میرے گھر کا مین گیٹ دروازہ باہر سے بند کر دیا۔ جملہ حالات میں گھر کے گیٹ میں لگے ہوئے  
دوربین سے دیکھ رہی تھی کہ میرے بیٹھے کو گاڑی کی پچھلی سیٹ میں سوار کر لے گئے اور گاڑی جردنڈہ سائڈ کی طرف لے گئے۔ مذکورہ  
پولیس وردی میں ملبوس اہلکار کو مین سامنے آنے پر شناخت کر سکتی ہوں۔  
یہی میرا بیان ہے جو حقیقت پر مبنی ہے۔

تحریر: 06.01.2020

دستخط

سوال کیا محمد عابد کبیل عبدالوہاب کبیل، بی بی آبت اللہ سے کوئی بھی  
بوقت وقوع وجود تھا یا نہیں ایک یا دو نے یا سنوں سے  
آپ کے سے کوئی افسا کر سکتے ہیں؟

جواب :- ان سنوں میں سے کوئی بھی وجود میں تھا ہم دونوں میاں خیل  
نے ان کو ایک اس میں کوئی دیکھ سکتے ہیں

SP. OPS-1  
6/1/2020

اسرار خان

اسرار خان

نیاضی SHO کون ہے ؟  
بہار اللہ

19

بیان ازان ملک فرہاد بنگش ولد نصر اللہ خان سکنتہ گڑھی ڈھوڑ یوال کوہاٹ،  
شناختی کارڈ نمبر 7-90211119-14301 موبائل نمبر 9999797-0333

حلفاً بیان کرتا ہوں کہ SHO آیت اللہ خان تھانہ سٹی میں SHO تعینات رہنے کے بعد میرا ترقی تعلق دار بن گیا اور میں نے مختلف جرائم کی نداد میں ہر قسم کی مدد/تعاون فراہم کی ہے اور اب بھی وقتاً فوقتاً سماج دشمن عناصر کے نام دیکر جس کو رنگے ہاتھوں گرفتار کروایا ہے۔ مورخہ 03.12.2019 کو SHO آیت اللہ اور گنر عبدالواہاب کے ساتھ کو جرائم پیشہ عناصر کی بابت خفیہ اطلاع کے سلسلے میں کئی بار ٹیلی فونک روابط ہوئے ہیں۔ نہ میں اس مقدمہ میں ملوث ہوں۔ چونکہ میں ایک مہذب پاکستانی شہری ہوں، بحیثیت پاکستانی شہری کوہاٹ پولیس کے ساتھ جرائم کے روک تھام میں ہر قسم کی جائز امداد کی ہے اور مزید بھی کرتا رہوں گا۔ جبکہ موجودہ SHO تھانہ سٹی فیاض جو کہ میرے ساتھ ذاتی عداوت ابدیتی کی بنا پر مجھے مقدمہ ہذا میں بے گناہ طور پر ملوث کیا۔ قبل ازیں بھی مذکورہ SHO نے میرے ساتھ سال 2012/2013 کو میں ہمراہ اپنے مستورات کے بطرف جانانہ میل جا رہے تھے، اس وقت فیاض ASI تھا، جس نے مجھے بمذہبی غلطی کا ڈر لگا کر اور مجھے گاڑی سے اتار کر میرے گھر کے مستورات کے سامنے مجھے نہایت نازیبا الفاظ کہے اور زدکوب کیا جس پر میں نے سابقہ مینسٹر قلب حسن کو فون کیا جس نے فیاض کو فون کر کے مجھے موقع پر چھوڑ دیا لیکن مذکورہ نے مجھے جاتے جاتے یہ دھمکی دی کہ آج تو مینسٹر نے بچایا ہے لیکن آئندہ آپ کے ساتھ دیکھوں گا۔

اس کے بعد SHO فیاض نے تھانہ سٹی میں تعینات ہوتے ہی مجھے فون کر کے تھانہ بلایا اور کہا کہ حلیم حیدر رپورٹ کے کیس میں میرے ساتھ تعاون کرو اور بعد میں مجھے اسی مقدمہ میں ہی چارج کیا جس کا یہ فعل بھی ذاتی عناد ہے۔ اور ابھی بھی مجھے فون کر کے تھانہ بلایا اور مقدمہ علت 1593 میں بے گناہ طور پر ملوث کیا۔ چونکہ SHO فیاض کا مسماۃ تابندہ کے ساتھ تعلق اداوتی ہے جس کے ساتھ میری بھی دوستی ہے اور SHO مذکورہ مجھے بار بار باز آنے کا کہا اور جس دن اس نے مجھے تھانہ بلایا اسی دن میرے موبائل لیکر کہا کہ اس میں تابندہ کی تصویریں ہیں اسکو ڈیلیٹ کر دو۔ جس کے بعد SHO نے خود تصویریں ڈیلیٹ کر کے جس کی ثبوت اگواہ میرے ساتھ موجود ہے اور پیش کر سکتا ہوں۔

یہی میرا بیان ہے جو حقیقت پر مبنی ہے۔

تحریر: 07.01.2020

دستخط  
07/01/2020

Mustaf  
S. P. K. G.



کراچی سولائیٹ

سوال: آئی کے SHO نے کیوں فون بجایا ہے؟

جواب: گھوٹا انٹارمیشن ٹیم اور ڈاڑھی کا (پہلے) گانا اس سلسلے میں  
SHO اور ٹیم سے کچھ مہربانی و رابطہ کیا۔

سوال: آئی کے SHO صاحب سے کیا سے تعلقاً ہے؟

جواب: - SHO صاحب جب SHO ہی تھا۔ اس وقت سے میرے  
اور اعداد کے سلسلے میں رٹنارمیشن ٹیم، ڈسٹریکٹ

سوال: ایک علاوہ آئی کے کن کن SHOs کے ساتھ تعلقاً ہے؟

جواب: - ڈیپٹی، ڈیپٹی، اسلام آباد، آصف علی، محبت خان کے  
ساتھ تعلقاً ہے۔

سوال: \_\_\_\_\_  
[Signature and Stamp]

Attestat:  
[Signature]  
SP-SPS  
7/11/2020

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### بیان ازان محمد علی ولد اسرار خان بمر 13/14 سال مکنتہ محلہ گڑھی مواز خان کوہاٹ

حلفاً بیان کرتا ہوں کہ مورخہ 03.12.2019 بوقت 16:30 بجے میں اپنے گھر خود میں موجود تھا کہ والدہ ام نے کہا کہ باہر جاؤ پولیس والے آپ سے کچھ معلومات کر رہے ہیں۔ جب میں باہر آیا تو میری تلاش لینا شروع کی اور یہ کہا کہ آپ محمد علی ہو۔ SHO صاحب گاڑی میں بیٹھے ہیں اور آپ کو بلارہے ہیں۔ گاڑی میں ٹوٹل چار ایکٹران جن میں دو ایکٹار پولیس کی وردی میں لمبوس تھے، مجھے ماسک پہنا کر ہاتھ بچلی کے تار سے باندھ کر اپنے ساتھ گاڑی میں بیٹھایا اور کہیں نامعلوم جگہ لے گئے۔ تقریباً 10:30 بجے مجھے ڈھوڑہ روڈ نزد گریڈ کرائڈ کالج پر چھوڑ دیا۔ جس کے بعد ایک راگبیر موٹر کار میں مجھے پولیس تھانہ سٹی لے آئے اور اپنے والدین سے ملوایا۔ میں ملزمان میں سے ایک ملزم کو شکل سے سمانے آنے پر پہچان سکتا ہوں۔ مزید جو اس آیت اللہ کاٹھیلان محمد عابد عبدالواہاب جس کو میرے سامنے پیش کیے لیکن ان میں سے کوئی شخص نہیں ہے۔

Appellant

یہی میرا بیان ہے جو حقیقت پر مبنی ہے۔

تحریر: 07.01.2020

Ali



Appellant

سوال: بر جو پولیس اہلکاران اور انسپکٹر عبدالواہاب اور محمد عابد جو ایکٹار سائے ہوئے

سے بر فرزندوں ان میں سے کوئی ایکٹار ٹوٹل نہیں تھا۔

جواب: ان لمبوسوں میں کوئی بھی شخص نہیں تھا اگر وہ ایکٹار سمانے آئے ہوتے تو میں

دیکھ سکتا ہوں۔

Attested  
SP - P - 1st

Ali

محمد علی ولد اسرار خان

Sahib  
اللہ

فاطمہ علی زورہ اشراہ



22

DEPARTMENTAL ENQUIRY AGAINST SI AYAT ULLAH

Respected Sir,

It is submitted that I have been appointed as enquiry officer, in departmental proceedings initiated against SI Ayat Ullah, the then SHO PS Cantt.

Short facts of the case are that on 03.12.2019 at 17:00 hrs complainant Fatima Gul Bibi r/o Muftallah Mian Badshah Kohat City reported the local Police that at 16:30 hrs her house door was knocked upon which she opened the door and found a person in Police uniform wearing mask. She informed her son named Muhammad Ali. In the meanwhile her son was taken away by persons wearing Police uniform in a vitz motorcar. In the meantime Israr Khan husband of the complainant unfolded that he has got dispute over landed property with one Farhad s/o Nasrullah r/o Ghari Dhodewal who was not paying Rs. 95 lac as sale consideration of land and threatened for dire consequences. He suspects that his son was taken away by him in Police uniform. The report was entered in daily diary No. 36 dated 03.12.2019 and investigation u/s 156 (iii) CrPC was initiated. Later on the abductee name above appeared before the Police and stated that on the eventful day two person in Police uniform and two others in civvies have taken away in a white color motorcar and asked that SHO has called him. The victim was examined u/s 161 & 164 CrPC. The proceedings culminated into registration of FIR vide No. 1593 dated 05.12.2019 u/s 365 PPC PS City against three accused.

As reported by SP Investigation vide his office No. 4640/Reader dated 24.12.2019 that SHO Ayat Ullah and his gunners named constable Abdul Wahab and Muhammad Abid had made telephonically contact with the accused before and after the commission of offence. They were called and interrogated during the course of investigation. Their contact with accused was established through CDR.

On the above, charge sheet and statement of allegations was issued against the defaulter official on the below charges:-

- i. On 03.12.2019, complainant of case FIR No. 1593, dated 05.12.2019 u/s 365 PPC PS City, reported regarding taking of her/his son by a person in Police uniform.
- ii. As contemplated from report of SP Investigation Kohat, your gunners named constable Abdul Wahab and Muhammad Abid had telephonically contacted with charged accused before and after occurrence.
- iii. It was also reported that you have also in contact with the accused on the eventful day i.e before and after the occurrence.

The charge sheet alongwith statement of the allegations was served upon the defaulter official, to which he submitted reply and deny the charge / allegations leveled against him.

In order to scrutinize the conduct of the accused official the following officials / witnesses were examined in presence of accused official.

1. SI Anwar Shah O.I.I
2. Israif Khan (husband of complainant) s/o Nisar Khan r/o Ghari Mawaz Khan.
3. Mst. Fatima Gul complainant
4. Muhammad Ali abductee.
5. Fahad s/o Nasrullah accused.

Besides facts of the case and investigation the witness O.I.I stated that CDR of accused Fahad was obtained which transpired that the accused official and his driver constables named above remained in contact with accused on the eventful day. He further stated that the victim party was subjected for identification of motorcar and accused but they failed to identify the accused and a motorcar used in the commission of offence.

It is pertinent to mention that all the charge accused have succeeded to secure bail before arrest on the basis of affidavit submitted by victims before the court.

From the above and available record I have reached to the conclusion that the complainant party has patched up the matter with the accused for the reasons best known to him and in order to save the skin of accused official and his two gunners / co-accused in the departmental proceedings. However, it has been established that the defaulter official and his gunners are biased to the accused and involved / connivance with the commission of offence. However, irrespective of the statements of the complainant party and confirmation of bail before arrest of the accused, it has been established from CDR and investigation that the accused official and his gunners were in contact with the accused before and after the commission of offence. The defaulter and his gunners have earned a bad name to the entire department and caused damage to the image of Police. Therefore, the charges and allegations leveled against the defaulter official SI Ayat Ullah have been established beyond any shadow. Hence, the defaulter official is recommended for a major punishment provided under Khyber Pakhtunkhwa, Police Rules 1975 (Amended 2014).

Submitted please

WDPO Kohat

*[Signature]*  
SP Operations, Kohat  
(Enquiry Officer)



**KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR**

No. 2596 /ST

Dated: 27/12 /2021

All communications should be  
addressed to the Registrar KPK Service  
Tribunal and not any official by name.

Ph:- 091-9212281  
Fax:- 091-9213262

To

The District Police Officer,  
Government of Khyber Pakhtunkhwa  
Kohat.

Subject: JUDGMENT IN APPEAL NO. 3326/2020 MR. ABDUL WAHAB.

I am directed to forward herewith a certified copy of Judgement dated  
02.12.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR