BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR AT CAMP COURT ABBOTTABAD

Service Appeal No. 10011/2020

Date of Institution ... 02.09.2020

Date of Decision ... 20.07.2022

Abdul Qadeer, Ex-Constable No. 1446, District Police Abbottabad. ... (Appellant)

<u>VERSUS</u>

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and three others. ... (Respondents)

MR. MOHAMMAD ASLAM TANOLI, Advocate

SYED NASEER-UD-DIN SHAH, Assistant Advocate General

MR. KALIM ARSHAD KHAN MR. SALAH-UD-DIN For appellant.

For respondents.

CHAIRMAN MEMBER (JUDICIAL)

JUDGMENT:

<u>SALAH-UD-DIN, MEMBER:-</u> Briefly stated the facts giving rise to filing of the instant service appeal are that disciplinary action was taken against the appellant (now died) on the allegations that he while posted at Police Station Bagnotar District Abbottabad, was in league with drug peddlers as well as timber smugglers and had facilitated them in carrying out their illegal business. On conclusion of the inquiry, the appellant was awarded major penalty of reduction from higher stage to lower stage in the same time scale of pay vide order dated 14.03.2019 passed by the then District Police officer Abbottabad. The same was challenged by the appellant through filing of departmental appeal, which was disposed of vide order dated 26.11.2019 passed by the then Regional Police Officer Hazara Region (Abbottabad), whereby the penalty awarded to the appellant was enhanced and he was

dismissed from service. The revision petition of the appellant was also rejected vide order dated 11.08.2020 issued from the office of Inspector General of Police Khyber Pakhtunkhwa Peshawar, hence the instant service appeal.

2. Respondents contested the appeal by way of submitting para-wise comments, wherein they refuted the assertions raised by the appellant in his appeal.

3. It is pertinent to mention herein that the appellant died during the pendency of the instant service appeal, therefore, his legal heirs were impleaded as appellants vide order dated 18.04.2022.

4. Learned counsel for the appellant has contended that no cogent oral or documentary evidence was procured by the inquiry officer in support of the allegations leveled against the appellant; that the inquiry proceedings were conducted in a haphazard manner and the mandatory provisions of Khyber Pakhtunkhwa Police Rules, 1975 were not complied with; that the appellant had performed his duties with honesty and disciplinary action was taken against him due to mala-fide intention for the purpose of stigmatizing his service career; that no copy of the inquiry report was provided to the appellant and he was thus unable to properly defend himself in the inquiry proceedings; that the appellate Authority had wrongly and illegally enhanced the penalty as no show-cause notice was issued to the appellant by the appellate Authority that it has proposed that the penalty awarded to the appellant may be enhanced; that the plea taken by the appellant in his replies to the charge sheet as well as show-cause notice were not at all considered by the competent Authority and the appellate Authority also dismissed the appeal of the appellant in a cursory manner; that the impugned orders being patently wrong and illegal are liable to be set-aside.

5. On the other hand, learned Assistant Advocate General for the respondents has contended that the appellant was a member of Police Force but he joined hands with drug peddlers as well as Timber Mafia and extended them active

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support in carrying out their illegal business; that the witnesses examined during the inquiry have supported the allegations leveled against the appellant and his guilt stood proved, therefore, he was rightly dismissed from service; that the appellant was provided opportunity of self defence as well as personal hearing but he remained unable to rebut the allegations through any cogent evidence in his support; that the inquiry proceedings were conducted by complying all legal and codal formalities, therefore, the impugned orders may be kept intact and the appeal in hand may be dismissed.

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6. We have heard arguments of learned counsel for the parties and have perused the record.

7. A perusal of the record would show that disciplinary action was taken against the appellant on the allegations reproduced as below:-

"You while posted at Police Station Bagnotar were allegedly in league with drug peddlers and Timber Smugglers. You also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without any fear of police raid and interception. In this connection you were issued show-cause notice, your reply of the show-cause notice was found unsatisfactory, hence this charge sheet and statement of allegations."

8. During the inquiry proceedings, the inquiry officer has recorded statements of four witnesses namely Inspector Qamar Zaman, the then SHO Police Station Bagnotar, Raja Haroon MHC. the then Muharrar Police Station Bagnotar, Muhammad Qadeer S/O Muhammad Bashir and Shakir Khan Jadoon S/O Goher Rehman Jadoon. It appears that disciplinary action was initiated against the appellant in wake of case FIR No. 364 dated 21.11.2018 under sections 371-A/371-B/9(b) CNSA/3/4 EHO Police Station Bagnotar, which was registered against accused namely Malik Ahmer S/0 Ijaz Ahmad, Ahmer S/0 Ahmad, Riaz Mst. Musarrat Bibi D/O Azad Khan and Mst. Shazia D/O

Emanuel George, who were allegedly arrested from a room of Shama Hotel situated at Bagnotar top and Charas weighing 450 gram and two bottles liquor were allegedly recovered from the room. Qamar Zaman SHO, who has been examined as witness in the inquiry proceedings, was complainant of the aforementioned case. Qamar Zaman SHO was the only witness, who had deposed in his statement recorded during the inquiry that the appellant were having links with drug statement of According to Oamar Zaman peddlers. SHO, official uniform of the appellant was recovered from the room of Shama Hotel and his motorcycle was also parked in the said hotel. The appellant has clarified in his statement that the recovered uniform belonged to Constable Usman and so far as the recovery of his motorcycle from Shama Hotel is concerned, the appellant as well as other police officials used to park their official motorcycles in Shama Hotel due to the reason that the pathway to police station Bagnotar was in dilapidated condition. Mr. Shakir Jadoon, who was running Shama Hotel, has categorically supported the aforementioned stance of the appellant in his statement recorded during the inquiry. The allegations of links of the appellant with drug peddlers was to be substantiated through some material evidence, however on scanning the record, we have observed that the inquiry officer could not collect any cogent evidence during the inquiry proceedings in support of the allegations leveled against the appellant. One of the allegation against the appellant was that he was having links with timber smugglers also but no evidence whatsoever was produced against the appellant in the inquiry proceedings. The said allegation against the appellant was thus also not proved.

9. The appellant was awarded major penalty of reduction from higher stage to lower stage in the same time scale of pay by the competent Authority vide O.B No. 69 dated 14.03.2019. Vide order dated 26.11.2019 passed by the then Regional Police Officer Hazara Region Abbottabad, the penalty awarded to the appellant was enhanced and he was dismissed from service. According to proviso to clause-(d) of sub-rule 4

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of rule-11 of Khyber Pakhtunkhwa Police Rules, 1975, where appellate Authority or Review Authority, as the case may be, proposes to enhance the penalty, it shall by an order in writing inform the accused of the action proposed to be taken against him and the ground of such action; that the appellate Authority or Review Authority, as the case may be, shall also provide reasonable opportunity to an accused to show-cause against the action and afford him an opportunity of personal hearing also. While going through the record, we have observed that the requirement mentioned in proviso to clause-(d) of sub-rule 4 of rule-11 of Khyber Pakhtunkhwa Police Rules, 1975 was not complied with by the appellate Authority, therefore, on this score alone, the impugned order dated 26.11.2019 passed by the appellate Authority is not sustainable in the eye of law.

Available on the record is show-cause notice dated 10. 30.11.2018 issued to the appellant, wherein it is categorically mentioned that the competent Authority had decided to proceed against the appellant in General Police proceedings without aid of inquiry officer, however on the other hand, charge sheet as well as statement of allegations were issued to the appellant and Ms. Sonia Shamrooz Additional SP Abbottabad was appointed as inquiry officer in the matter. Similarly, after passing of impugned order dated 26.11.2019 by the appellate Authority, the then District Police Officer Kohistan passed another order bearing O.B No. 130 dated 28.11.2019 regarding the enhancement of penalty of the appellant to penalty of dismissal from service. All this would show that the inquiry proceedings were conducted in a haphazard manner.

11. Consequently, the impugned orders stand set-aside and the appeal in hand is allowed as prayed for.

12. Before parting, we deem it necessary to expound for removal of difficulties in giving effect to operative part of the judgment that due to death of the appellant during pendency of appeal, his posthumous reinstatement into service will be

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ordered and he will be treated to have died during service. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED 20.07.2022

(SALAH-UD-DIN) MEMBER (JUDICIAL) CAMP COURT ABBOTTABAD

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(KALIM ARSHAD KHAN) CHAIRMAN CAMP COURT ABBOTTABAD

Service Appeal No. 10011/2020

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<u>O R D E R</u> 20.07.2022 Learned counsel for the appellants present. Mr. Muhammad Azhar, Head Constable alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present and submitted inquiry record, which is placed on file. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the impugned orders stand set-aside and the appeal in hand is allowed as prayed for.

Before parting, we deem it necessary to expound for removal of difficulties in giving effect to operative part of the judgment that due to death of the appellant during pendency of appeal, his posthumous reinstatement into service will be ordered and he will be treated to have died during service. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED 20.07.2022

(Kalim Arshad Khan) Chairman Camp Court Abbottabad

(Salah-Ud-Din) Member (Judicial) Camp Court Abbottabad

19.05.2022

Learned counsel for the appellant present. Syed Naseer Ud Din, Assistant Advocate General alongwith Mr. Shamriaz Khan, SI for respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief. To come up for arguments before D.B on 19.07.2022 at camp court Abbottabad.

(Fareeha Paul) Member(E)

(Kalim Arshad Khan) Chairman Camp Court Abbottabad

19th July 2022

Counsel for the appellant. Syed Naseer Ud Din Shah, Asst: AG for respondents present.

Complete enquiry record has not been annexed with the appeal by the appellant nor submitted by the respondents, therefore, respondents are directed to produce complete enquiry record and come up for arguments on 20.07.2022 before D.B at camp court Abbottabad.

(Salah Ud Din) Member (Judicial)

(Kalim Arshad Khan) Chairman Camp Court Abbottabad 17.01.2022

Counsel for the appellant present. Mr. Shamraz Khan, ASI on behalf of respondents No. 1 to 3 alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Para-wise reply on behalf of respondents No. 1 to 3 submitted, which is placed on file and copy of the same is handed over to learned counsel for the appellant. Respondent No. 4 has failed to submit his written reply/comments even today, therefore, in light of pervious order dated 17.11.2021 his right for submission of written reply/comments thus stands struck off. Adjourned. To come up for rejoinder, if any, as well as arguments on 18.04.2022 before the D.B at Camp Court Abbottabad.

(Salah-ud-Din) Member (J) Camp Court A/Abad

18.04.2022

Father of the appellant alongwith learned counsel for the appellant present. Mr. Shamraiz Khan, ASI (Legal) alongwith Mr. Noor Zaman Khattak, District Attorney for the respondents present.

Learned counsel for the appellant stated at the bar that the appellant has died and submitted an application for impleadment of legal heirs of the appellant as appellants in the instant appeal. Copy of the application handed over to learned District Attorney, who is having no objection on impleadment application. Application is, therefore, allowed and office is directed to do the needful accordingly.

Mr. Muhammad Aslam Tanoli, Advocate also submitted Wakalatnama on behalf of the impleaded appellants, which is placed on file. Adjourned. To come up for arguments on 18.05.2022 before the D.B at Camp Court Abbottabad.

(Rozina Rehman) Member (J) Camp Court Abbottabad (Salah-ud-Din) Member (J) Camp Court Abbottabad 15.06.2021

Due to cancellation of tour, Bench is not available. Therefore, case to come up for the same as before on 30.09.2021.

30.09.2021

Appellant in person and Mr. Muhammad Adeel Butt, Addl. AG alongwith Atif Ali, Law Advisor for the respondents present.

Written reply of the respondents is still awaited. Respondents are directed to furnish reply/comments on the next date positively, failing which their right for submission of written reply/comments shall be deemed as struck off and the appeal will be heard on the basis of available record without reply of the respondents. Case to come up on 17.11.2021 before S.B at camp court, Abbottabad.

Camp Court, A/Abad

17.11.2021

Counsel for the appellant and Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG alongwith Shamraiz Khan, ASI for the respondents present.

Representative of the respondents seeks further time to furnish reply/comments. Last opportunity is granted to the respondents to submit written reply/comments on the next date, failing which their right for submission of written reply/comments shall be deemed as struck off. Case to come up on 17.02.2022 before S.B at camp court, Abbottabad.

Camp Court, A/Abad

Due to COVID-19, the case is adjourned for the same on 19.02.2021.

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19.02.2021

Appellant Deposited

Process Fee

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Appellant present through counsel.

Preliminary arguments heard. File perused.

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

15.06.2021 before S.B at Camp Court, Abbottabad.

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Form- A

FORM OF ORDER SHEET

Court of

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Case No.-

/2020

S.No. Date of order Order or other proceedings with signature of judge proceedings 1 2 3 The appeal of Mr. Abdul Qadeer presented today by Mr. 02/09/2020 1-Muhammad Aslam Khan Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. REGISTRAR This case is entrusted to touring S. Bench at A.Abad for 2- preliminary hearing to be put up there on 19-01-2021 CHAIRMAN

BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No.....

Abdul Qadeer, Ex-Constable No. 1446, District Police Abbottabad.

Appellant

VERSUS

- 1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
- 2. Regional Police Officer, Hazara Region, Abbottabad.
- 3. District Police Officer, Abbottabad.
- 4. District Police Officer, Kohistan.

Respondents

SERVICE APPEAL

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Through

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(Mohammad Aslam Tanoli) Advocate High Court at Haripur

Dated: 2-09-2020

BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR Service Tribunal

Appeal No. *1.6.0.1.1.....*

Diary No. 446 X

Abdul Qadeer, Ex-Constable Abbottabad.

le No. 1446,

District Police

Appellant

<u>VERSUS</u>

1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.

2. Regional Police Officer, Hazara Region, Abbottabad.

3. District Police Officer, Abbottabad.

4. District Police Officer, Kohistan.

<u>Respondents</u>

SERVICE APPEAL UNDER SECTION-4 OF KPK SERVICE TRIBUNAL ACT 1974 AGAINST ORDER DATED 14-03-2019 OF THE DISTRICT POLICE OFFICER ABBOTTABAD WHEREBY APPELLANT WAS AWARDED PENALTY OF REDUCTION FROM HIGHER STAGE TO LOWER STAGE IN THE SAME TIME SCALE OF PAY AND ORDER DATED 26-11-2019 OF THE REGIONAL POLICE OFFICER HAZARA REGION ABBOTTABAD WHEREBY APPELLANT'S PENALTY WAS ENHANCED FROM REDUCTION OF PAY TO DISMISSAL FROM SERVICE AND DISTRICT POLICE OFFICER UPPER KOHISTAN ORDER DATED 28-11-2019 WHEREBY APPELLANT'S PENALTY AWARDED BY DPO ABBOTTABAD WAS ALSO ENHANCED TO DISMISSAL FROM SERVICE AND ADDITIONAL INSPECTOR GENERAL OF POLICE KPK ORDER DATED 11-2020 WHEREBY HIS MERCY APPEAL HAS

Registing RAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEAL 19120 ORDERS DATED 14-03-2019, 26-11-2019, 28-11-2019 AND 11-08-2020 OF RESPONDENTS MAY GRACIOUSLY BE SET ASIDE AND APPELLANT BE REINSTATED IN SERVICE FROM THE DATE OF DISMISSAL WITH ALL CONSEQUENTIAL SERVICE BACK BENEFITS.

Respectfully Sheweth:

 That appellant while posted as Constable at Police Station Bagnotar was issued with a Charge Sheet dated 01-01-2019 by the District Police Officer



Abbottabad which was duly replied on 08-01-2019 explaining all facts in detail denying the allegations being incorrect and baseless. (Copies of Charge Sheet dated 01-01-2019 and its reply dated 08-01-2019 are attached as annexure as "A & B").

- 2. That thereafter the appellant was served upon with a Final Show Cause Notice dated 22-02-2019 by the District Police Officer Abbottabad which was also duly replied on 26-02-2019 in detail explaining the facts of the matter by denying the allegation being incorrect and baseless. (Copies of Final Show Cause Notice dated 22-02-2019 and its reply dated 26-02-2019 are attached as annexure as "C & D").
- 3. That without taking into consideration the stance advanced by appellant in shape of reply to Charge Shee as well as Final Show Cause Notice, the District Police Officer, Abbottabad awarded the appellant the penalty of "Reduction from Higher Stage to Lower Stage in the same Time Scale of Pay" vide order OB No. 59 dated 14-03-2019 without any reason and proof. (Copy of order dated 14-03-2019 is as annexed as "E").
- 4. That order of the District Police Officer, Abbottabad dated 14-03-2019 was appealed against before the Regional Police Officer Hazara Region Abbottabad by the appellant on 26-03-2019. (Copy of the department appeal dated 26-03-2019 is attached as Annexure "F").

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5. That firstly on receipt of the Departmental Appeal the Regional Police Officer Hazara Region Abbottabad transferred the appellant from District Abbottabad to District Upper Kohistan vide order No. 8390-91 dated 29-03-2019. (Copy of transfer order dated 29-03-2019 is attached as Annexure "G").

- 6. That subsequently after about 08 months of filing of departmental appeal the Regional Police Officer Hazara Region Abbottabad vide his office letter Dated 26-11-2019 enhanced the penalty of Reduction from higher stage to lower stage in the same time scale of pay awarded by DPO Abbottabad into that of Dismissal from Service illegally, unlawfully and against the departmental rules and regulation without any reason. (Copy of dismissal order dated 26-11-2019 is attached as Annexure "H").
- 7. That thereafter the District Police Officer Upper Kohistan vide his letter No.1998/OHC dated 28-11-2019 once again dismissed the appellant from service with immediate effect with out any reason and justification. (Copy of dismissal order dated 28-11-2019 is attached as Annexure "I").
- 8. That appellant preferred a Mercy Appeal before the Provincial Police Officer KPK Peshawar (copy could not be retained) which was rejected by the Addi Inspector General of Police KPK Peshawar vide order dated 11-08-2020. (Copy of the order dated 11-08-2020 is attached as Annexure "J").

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- 9. That in fact while appellant posted at Police Station Bagnotar, the SHO concerned developed enmity and vendetta against him due to personal grudge. The SHO concerned was bent upon to get the appellant dismissed from service at any cost for which he misled the District Police Officer Abbottabad and concocted false, fabricated and baseless stories against the appellant and did not spare him unless he was from service. Otherwise there was nothing true against the appellant in the Charge Sheet and Show Cause Notice. Appellant had no concern with the narcotics peddlers or timber smugglers. Nothing could be brought against the appellant before awarding him firstly with the penalty of "reduction from higher stage to lower stage in the same time scale of pay" and thereafter dismissal from service. Though the inquiry officers were fully satisfied and of the opinion that appellant was innocent yet they were under the pressure of District Police Officer Abbottabad as he was misled by the SHO concerned against the appellant.
- 10. That the allegations leveled against the appellant in the charge sheet and Show Cause Notice were of ambiguous nature, without any reason, reference, justification and based on surmises and conjectures which remained un-proved and un-substantiated to this day. During his posting at Police Station Bagnotar Abbottabad, the appellant discharged his assigned duties with devotion and honesty always fighting against the forces of the criminals. He pointed out and

got arrested the narcotics paddlers, timber smugglers, gamblers and other species of different type criminals. He left no stone un-turned in discharge of his official duties and responsibilities.

- 11. That no proper departmental inquiry was conducted. No Show Cause Notice was given by appellate authority while enhancing appellant's penalty as to that of dismissal from service. Copy of inquiry findings was not issued to the appellant. Even opportunity of personal hearing was not afforded to him. Appellant was awarded penalties illegally, against the law, without lawful authority, in a slipshod, cursory, whimsical and arbitrary manner, without any reason and justification rather with malafide intention.
- 12. That the appellant was enrolled in the Police Department as Constable in 2008 and has rendered more than 13 years service. He always performed his duties with devotion, dedication and honesty to the entire satisfaction of his officers. He was awarded with commendation certificates and cash rewards by Police High-Ups due to his tremendous services. Appellant has meritorious service record at his credit.
- 13. That appellant aggrieved of the orders dated 13. That appellant aggrieved of the orders dated 14-03-2019, 26-11-2019, 28-11-2019 and 11-08-2020 of the respondents has filed instant service appeal, inter alia, on the following amongst others:-

GROUNDS:

- 6
- a) That impugned orders dated (14-03-2019, 26-11-2019, 28-11-2019 and 11-08-2020 of the respondents are illegal, unlawful against the facts, departmental rules and regulations and principle of natural justice hence are liable to be set aside.
- b) That no proper departmental inquiry was conducted. Copy of inquiry report, if any, was never provided to appellant. No Show Cause Notice was given to him before awarding punishment of dismissal from service. Even opportunity of personal hearing was afforded to the appellant rather he was condemned unheard.
- c) That respondents have not treated the appellant in accordance with law, departmental rules & regulations and policy on the subject and have acted in violation of Article-4 of constitution of Islamic Republic of Pakistan 1973 and unlawfully issued the impugned orders, which are unjust, unfair hence not sustainable in the eyes of law.
- d) That appellate authority has also failed to abide by the law and even did not take into consideration the grounds taken by appellant in the memo of appeal and has enhanced the penalty without any reason. Thus act of respondent is contrary to the law as laid down in the KPK Police Rules 1934 read with section 24-A of General Clause Act 1897 and Article 10-A of the Constitution of Islamic Republic of Pakistan 1973.

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e) That appellant has discharged his assigned duties with devotion, dedication and honesty always fighting against the forces of criminals. He pointed out and got arrested the narcotics paddlers, timber smugglers, gamblers and other species of different type criminals. He left no stone un-turned in discharge of his official duties and responsibilities.

- f) That the allegations leveled against appellant in the charge sheet and show cause notice are of ambiguous nature, without any reason, reference, justification and based on surmises & conjectures which remained unproved and un-substantiated to this day. Nothing could be brought on record against appellant like his links with narcotic peddlers or timber smugglers etc for which he has been awarded with extreme major punishment of dismissal from service.
- g) That since his dismissal from service, the appellant is without job and has no source of income to live on, and is therefore, along with his family has been suffering badly with financial distresses.
- h) That instant appeal is well within time and this honorable
 Service Tribunal has got every jurisdiction to entertain and
 adjudication upon the same.

PRAYER:

It is, therefore, humbly prayed that on acceptance of instant Service Appeal order dated 2222014-03-2019, 26-11-2019, 28-11-2019 and 11-08-2020 of the respondents may graciously be set aside and appellant be reinstated in his service from the date of dismissal with all consequential service back benefits. Any other relief which this Honorable Service Tribunal deems fit and proper in circumstances of the case may also be granted.

Through:

Appellant (Mohan mad Aslam Tanoli)

Advocate High Court At Haripur

Dated **2-09-2020**

VERIFICATION

It is verified that the contents of instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed thereof.

éllant

Dated 2-09-2020



BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Abdul Qadeer, Ex-Constable No. 1446, District Police Abbottabad.

Appellant

VERSUS

- 1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
- 2. Regional Police Officer, Hazara Region, Abbottabad.
- 3. District Police Officer, Abbottabad.

4. District Police Officer, Kohistan.

<u>Respondents</u>

APPELLANT

SERVICE APPEAL

CERTIFICATE

It is certified that no such Appeal on the subject has ever been filed in this Honorable Service Tribunal or any other court prior to instant one.

Dated: 2-09-2020

BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Abdul Qadeer, Abbottabad.

er, Ex-Coi

Ex-Constable No. 1446,

District Police

Appellant

<u>VERSUS</u>

1. Provincial Police Officer, Khyber Paktunkhwa, Peshawar.

2. Regional Police Officer, Hazara Region, Abbottabad.

3. District Police Officer, Abbottabad.

4. District Police Officer, Kohistan.

Respondents

SERVICE APPEAL

AFFIDAVIT:

I, Abdul Qadeer appellant do hereby solemnly declare and affirm on oath that the contents of the instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honorable Service Tribung Align

ARIPUR

eponent/Appellant

Dated: 2-00-2020 Identified By:

Mohammad Aslam Tanoli Advocate High Court At Haripur

Appellant

CHARGE SHEET

Annex_

1). I Abbas Majeed Khan Marwat (PSP) District Police Officer Abbottabad as competent authority hereby charge you <u>Constable Abdul Qadeer No.</u> <u>1446 Police Lines Abbottabad</u> as explained in the attached statement of allegations.

You appear to be guilty of misconduct under Police Disciplinary Rules
 1975, and have rendered yourself liable to all or any of the penalties specified in the said
 Police Disciplinary Rules.

3). You are therefore, directed to submit your written defense within seven days on the receipt of this Charge Sheet in the Enquiry Officer.

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

Intimate whether you desire to be heard in person or otherwise. A statement of allegations is enclosed.

5). 6).

Abbas Maie

d Khan Marwat, PSP istrict Police Officer Abbottabad

tested

Page 1 of 2



I Abbas Majeed Khan Marwat (PSP) District Police Officer Abbottabad as Competent Authority of the opinion that you <u>Constable Abdul Qadeer</u> <u>No. 1446 Police Lines Abbottabad</u> rendered yourself liable to be proceeded against as you committed the following act/omission within the meaning of Police Disciplinary Rules 1975.

STATEMENT OF THE ALLEGATIONS

1). You while posted at Police Station Bagnotar allegedly in league with drug peddlers and timber smugglers. You also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception. In this connection you were issued Show Cause Notice, your reply of Show Cause Notice found unsatisfactory, hence this charge sheet and statement of allegations.

For the purpose of scrutinizing your conduct with reference to the above allegations, <u>Ms. Sonia Shamroz Addl: SP Abbottabad</u> is appointed as Enquiry Officer.

3). The Enquiry Officer shall in accordance with the provision of this ordinance, provide reasonable opportunity of hearing to the accused, record finding and make within 25 days of the receipt of this order, recommendation as to punishment or the appropriate action the accused.

4). The accused a well conversant representative of departmental shall in the proceedings on the date, time and place fixed by the Enquiry Officer.

> Abbas Majeed Khan Marwat, PSP District Police Officer Abbottabad



CC: <u>Constable Abdul Qadee: No. 1446 Police Lines Abbottabad</u>, with the direction to submit his defense within 07 days of the receipt of this statement of

allegations and also to appear before the Enquiry Officer of the date, time and place fixed for the purpose of departmental proceedings.

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/PA, Dated Abbottabad the 11

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Home -iller بحاله مشهل جاج تنبي و سانوي المش ليز غيري AA/207 قارم معن موں تر من فتح الم اس من مع () سال سے طارت کر ري سال سے معام كي مري عيدان اور لقر ال انسرا جات ماهيان ابنا و اسا قام میں براغام دی جا ہوا ، سالا وران تعیناتی میں به والي ملك مراية المالوري عامة إلي ويلق المجاري وي عالم عالم عالم ما حبان تقام ن سامی ی تر او وی دیسی ار و المان شمس ف ی تو slu رباجيل سائل كو فروكرد إلا جارج شين مل بي جس ك مطابق سائل منشيات فروشون عب سیال کے سابق ماری دلینا ہے جبکہ یرالز ا مقیقت کے بائیل بر حکس بع دس شرون نے طور بر من سائل کا ڈیون میں دلجون کا تو ج سے دیں گئے A. 98.9 در ان کے A. 98.9 در مرج جی طار خطر کینے جا بیلنے ہیں ، اگر سائل منتیات خرمتیوں کر ساتھ طارب دکھتا تھ سائل بھی ج السيار مشيان Files مين معادين مركز -1360 . عرم ایک سال کا تعیناتی میں سال نے دار تر کشت کام اور نمایت ایمانداری کے ساتھ ایک کا براغام دفاج - سامی کا اس تعیانی نے دوران سامی کا کی در بامی بران ش می ج الكرساني في حرباني بر خريران كما بن في الم مساح كو مرباح كما يوزلينون مما كما بنا الخ امر-ای کر قرد حرط کی کا بوزلیس ما مند من موظ فعا موسط کی من خیر قانون ما مرح وا2 ترك Facelitate كرنا بي الن الى برد بزار ع. مال ماغیر شقارز کا سانق بھی کوئی تعلق ترج اسے مربع دولی تعیناتی اس قسم کا مکرد د عند والرب عراق الحفاظ بينما رضاية - ساع تفاع لمنهم من تعسان ها برم روز مع كافى بن تربي فيكر جين تروز بم جونى مرز واقع م جرمان بر مترى تير في عين بن اور و منه به المراكل مر وراً منه الم متراز واقع م جرمان بر مترى كير في عين بن الد مو الى الى الري كان عن الكرسالى تقان كا فيو ساكم المقارر كا مدر الله تفرجوت برقر اور خارست برز س مدو کی گزر چاتی تق سائل حلقاً بالل عديك كرور في خير قالول كما كر واح 2 سابق سائل ما توفى بالعاق ب معاطر ما باری بین سے انکوا شری کرانی جا کر سائل کو العاف دیتے سے فرار جرالاج بنیادا رائل سے بری الزم قرار دیا جا

OFFICE OF THE DISTRICT POLICE OFFICER, ABBOTTABAD

No: 36 /PA, Dated Abbottabad, the 3/ 102 /2019.

FINAL SHOW CAUSE NOTICE (Unit Rule (3) KPK Police Rules, 1975)

That you **Constable Abdul Qadeer No. 1446 Police Lines Abbottabad**, rendered yourself liable to be proceeded under Rule 5 (3) of the Khyber Pakhtunkhwa Police Rules 1975 for following misconduct;

You while posted at Police Station Bagnotar allegedly in league with drug peddlers and timber smugglers. You also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception. In this connection you were issued Show Cause Notice, your reply of Show Cause Notice found unsatisfactory, hence this charge sheet and statement of allegations.

II. During proper departmental enquiry the allegations have been proved against you.

- 2. That by reason of above, as sufficient material is placed before the undersigned therefore it is decided to proceed against you in general Police proceedings without aid of enquiry officer;
- 3. That the misconduct on your part is prejudicial to good order of discipline in the Police force.
- That your retention in the police force will amount to encouragement of inefficient Police officers;
- 5. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the Rules.
- 6. You are, therefore, called upon to Final Show Cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 for the misconduct referred to above.
- 7. You should submit reply to this Final Show Cause Notice within 07 days of the receipt of the notice failing which an ex parte action shall be taken against you.
- 8. You are further directed to inform the undersigned that you wish to be heard in person or not.
- 9. C. unds of action are also enclosed with this notice.

Healey What

Dr District Police Officer Abbottabad

Received by Dated 22/02/2019.

بوالد شموله فائینل شوکازنوش لیٹر نمبری 36/PA مجاریہ 2019-20-22 پر معروض خدمت مشکر ایک میں 11 سال سے ملاز مت کررہا ہے۔اور عرصہ قریب ایک سال سے تھا نہ کمنو تر میں تعیینات اور 07 مشرو شیخ سن حصا سے ساتھ اپنی ڈیوٹی ای تھا نہ میں سر انجام دے چکا ہوں ۔ ساکل اپنی پوری نوکری میں کبھی بھی بدنا کی کہ باعث نہ بنا ہے کہ سابقہ تمام آ فیسر من ساکل کی Punchuality کی ہمیشہ زبانی تعریف کی ہے۔ساکل نے انتہائی ایسد ارز کی ساتھ نوک

Annex-

اب جبکہ سائل کو متذکرہ بالا فائنل شوکا زنوٹس ملاہے جس کے مطابق سائل منشیات فروشوں کے ماتھ ملاپ رکھتا ہے۔ جبکہ بیالزام حقیقت کے بالکل برتکس ہے۔ جس کے ثبوت کے طور پڑمن سائل کی ڈیوٹی میں دلچیپی اور ایما نداری کی وجہ سے دیے گئے PA,9B,9C CNSA کے پر چبھی ملاحظہ کیے جاسکتے ہیں۔ اگر سائل کے منشیات فروشوں کے ساتھ ملاپ ہوتا تو انسداد منشبات FIRs میں معاونت نہ کرتا۔

جناب SHO صاحب نے بیدالزام لگایا ہے کہ وقوعہ کے ٹائم سرکاری موٹر سائیکل اور سرکاری وردی بھی برآمد کی جبکہ سرکاری موٹر سائیکل میں یا کوئی بھی رائیڈرڈیوٹی کے بعد موٹر سائعکل سرکاری ہوٹل میں کھڑا کرتا تھا۔ چونکہ تھانہ کا راستہ نہایت خراب ہے ۔اور دردی جو SHO صاحب کو ملی وہ کنٹ میں خان کی تھی ۔ جسکا تھوڑ ے دن پہلے متبادلہ ہو گیا تھا۔ جواپنی وردی کسی دہہ ہے نہیں لے کر گیا ہوگا۔ جوآپ شاکر خان ہوٹل والے کا بیان بھی ملاحظہ کر سکتے ہیں ۔

ای طرح تمبر سمگرز کے ساتھ بھی سائل کا کوئی تعلق یا رابطہ نہ ہے۔ اور نہ بی دوران تعیناتی سائل تبھی بھی اس مکروع دھند ہے ہیں ملوث افراد کے ساتھ اٹھنا بیٹھنا کیا ہے۔ سائل تھا نہ بگنو ترجو کہ روڈ سے کافی ہٹ کر ہے تعینات ہے جبکہ مین روڈ پر چوک ہرنو داقع ہے۔ اگر سائل تھا نہ کی حدود سے ٹمبر سمگر کی مدد کرتا ہے تو ہرنو چوکی اور فارسٹ برئیر سے ککر کیسے گزر جاتی ہے۔ سائل حلفاً بیانی ہے کسی بھی غیر قانو نی کا م کرنے والے کے ساتھ سائل کا کوئی بھی تعلق نہ ہے رائی سائل میں دور ان یولیس تجربے طور پر جانتا ہے اور تعلق ہے استد عاہی کہ فاکس شوکا ز داخل دفتر فر مایا جاؤے۔



مائل كنستيبل عبدالقد كرنمبر 1446 متعينه بوليس لائن شلع ايب آباد المرقوم 26-02-2019

<u>ORDER</u>

This office order will dispose of the departmental enquiry against **Constable Abdul Qadeer Khan No. 1446, the then Police Station Bagnotar.** He while posted at Police Station Bagnotar allegedly in league with drug peddlers and timber smugglers. He also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception. In this connection he was issued Show Cause Notice, his reply of Show Cause Notice found unsatisfactory.

He was issued Charge Sheet along with statement of allegations. **Mr. Abdul Aziz Khan Afridi, SP, Investigation, Abbottabad** was appointed as Enquiry Officer. He conducted proper departmental enquiry against the delinquent officer and recorded statements of all concerned. After conducting proper departmental enquiry, the Enquiry Officer submitted his findings, wherein allegations have been proved against him. Consequently he was issued Final Show Cause Notice. He was summoned to appear in Orderly Room on 14-03-2019. He was given a patient hearing but he had nothing plausible to state in his defence.

Therefore, in exercise of the powers vested in the undersigned Police Disciplinary Rules-1975 (Amended 2014), I, Abbas Majeed Khan Marwat, PSP, District Police Officer, Abbottabad as a competent authority, am constrained to award him the punishment of <u>Reduction from higher stage to lower stage in the same time scale of pay</u> with immediate effect.

Order announced.

OB NOS9 14:3.19

A Police Officer Distri obottabad

containing 46 pages for

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Pay Officer, DPO Office Abbottabad.

Establishment Assistant.

OHC alongwith complete Enquiry File completion of record.

Annex F بحضور جناب DIG صاحب پولیس ہزارہ ریجن آیا ہو **د جسم البیسل** بناراضی علم مصدره بحوالد آر در یک نم بر 59 مورجه 2019-03-14 مجار بداز <u>دفتر جناب DPO صاحب ایپ آباد جس کے ذریعے سائل کو نا کردہ گناہ میں محض ذاتی رنجش</u> <u> _ بحجت جھوٹے اور بے بنیاد زبانی خود ساختہ بیان ار پورٹ بر سائل کی گیارہ سالہ پیندیدہ</u> <u>طازمت کی ترقیوں کو ضبط کیا جا کرنا قابل تلانی بردی خالمانہ مزاد ہے کر مالی نقصان کے علاوہ ترقی</u> میں رکاوٹ جائل کر دی گئی۔ **است عا** ب<u>ک</u>منصفاندادرغیرجانیدارند فیصلید یا جا کرسائل کودی گئی ناجا تزمیز اکالعدم د منسوخ فرمائی جا کردادری فرمائی جادے۔ منوجبات رحم اپیل درج ذیل ہیں:۔ جناب عالى! ۱- سیر که ساکن ور<u>ضه 2008-12-1</u>0 کومحکمه پولیس ضل ایب **آبادین بطور کنش کو**ر تک موکر ساکن بعد پاس کرنے ریکر وٹ کورس ضلع ایب آباد ہیں خوش اسلوبی ہے خد مات سرانجام دیتار ہا بھیج 🕷 ۲ - سیر که بد دران تعیناتی تھانہ بکنو تر ذاتی رنجش کی بناء پر SHO تھانہ بکنو تر کی حصوفی من گھڑت اور بے بنیا دشکایت پر تصح سنگین نوعیت کی سزا دی جا کر میری گیارہ سالہ ملازمت پسندیدہ ضبط کی جائز بچھے نا قابل تلافی نقصان پہنچائے جانے کی نیت سے میر بے خلاف انگوائر کی افسران پر بھی اثر ڈالا جا کر ناجا تز ہزا دے دی گئی جو میں زبانی طور منصل حالات گوش گز ار کر دن گا۔ استدعا ہے کہ سائل کی رحم اپیل ذاتی طور پر سی جا کر سائل کو دی گئی نا جا مز سز اکا لعدم دمنسوخ فرمائی جادے۔ العارض Sir, Forwarded PL <u>المرقوم:2019-26-03</u> 13114 عبدالقديرخان تنشيل نمبر 1446 RI/Line Abbettabad تقانه بكنوتر حال يوليس لائن، ايب آباد Date 26 - 03 - 2019 Forw grade plz. 527.3-19

Constable Qadeer No.1446 of Abbottabad District is hereby transferred and posted to Upper Kohistan District on complaint basis with immediate effect. Regional Police Officer, Hazara Region Abbottabad No. <u>8340-91</u> /E, dated Abbottabad the <u>29-03</u> /2019. Copy of above is forwarded for information and necessary action to the:-

ORDER.

- 1. District Police Officer, Abbottabad w/r to his office Memo: No 2181/R dated 28-03-2019.
- 2. District Police Officer, Upper Kohistan.

EC/OASI Reader NA For

かれた **OF THE REGIONAL POLICE OFFICER HAZARA REGION, ABBOTTABAD** 0992-9310021-22 **0992-9310023** r.rpohazara@gmail.com 0345-9560687 312-13 DATE 26 / 1/ 12019 / PA NO:

ORDER

This order is hereby passed to dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by Constable Abdul Qadeer No. 1446 of District Upper Kohistan against the order of punishment i.e. Reduction from higher stage to lower stage in same time scale of pay awarded by District Police Officer, Abbottabad vide OB No. 59 dated 14.03.2019.

Facts leading to the punishment are that the official while posted at Police Station Bagnotar allegedly remained in league with drug peddlers and timber smugglers. He also kept informed the drug peddlers and timber smugglers whereabouts and the position of Police mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception.

After receiving his appeal, comments of DPO Abbottabad were obtained and examined/perused. The undersigned called the official in OR and heard him in person. As evidence is clear against the official and he failed to advance any plausible reason in his defence. Therefore in exercise of power conferred upon the undersigned under Rule 11-4 (c) of Khyber Pakhtunkhwa, Police Rules 1975, punishment awarded by DPO Abbottabad is hereby enhanced to major punishment of Dismissal from service with immediate effect.

> Dr.Mazhar-ulhaq Kakakhel (PSP/PPM/S.St)

-Sd-

No. 3/2-14-16 /PA, dated Abbottabad the N + 1 - 2 - - -

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26-11 /2019.

1. The District Police Officer, Upper Kohistan for information and necessary action.

2. The District Police Officer, Abbottabad with reference to his office Memo No 2470/Legal dated 09-05-2019.

3. Establishment Branch.

rshad Office Superintendent

Page 1 of 2

For Regional Police Officer Hazara-Region (Abbottabad) **O** R D <u>E</u> <u>R</u>

in compliance with the order of worthy/Regional Polle Portil Aboliano + Hazara Region Abbottabad vide his office order Endst: No. 31213/PA, dated 26-11-2019. This order is hereby passed to dispose off departmental appear under Rule 11-A of Ehyper Pakhtunkhwa, Police Rule, 1975 submitted by constable Abdul Qadeer No. 271/1446 of District Upper Kohistan against the order of punishment ie. Reduction from higher stage to lower stage in same time scale of pay avarded by District Police Officer, Abbottabad vide OB No. 59, dated 14-03-2019.

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Dated 29

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effect. (ABDUL/SABOOR KHAN)PSP od - 28/11/2019 District Police Officer, Upper Kohistan 10-1C, dated Kohisian the 2.8 / 11 /2019. Copy of the above is forwarded for favour of information to:-No. 1998 1. The Regional Police Officer, Hazara Region, Abbottabad with reference to his office ietter number quoted above, please. 2. Pay Officer DPO office Upper Kohistan. 3. SRC DEO office Upper Kohistan. IN (ABDUE SABOOR KHAN)PSP A District Police Officer, DIN Kohistan MAT21HOX SPERU 093: MO94 T 190 3000 VISLEW BI Edit ND: : 0338405123 1 -

SPECTOR GENERAL OF POLICE KHYBER PAKHTUNKHWA PESHAWAR.

OFFICE OF THE

/20, dated Peshawar the $1/\sqrt{\alpha}/2020$.

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<u>ORDER</u>

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 Qadeer No. 1446.

Brief facts of the case are that the above named ex-official was awarded punishment of reduction from higher stage to lower stage in the same time scale of pay by District Police Officer, Abbottabad vide OB No. 59, dated 14.03.2019 on the allegations that he while posted at PS Bagnotar allegedly remained in league with drug peddlers, and timber smugglers. He also kept informed the drug peddlers and timber smugglers whereabouts and the position of Police mobile and facilitated them to earry out their illegal business without any fear of Police raid and interception. He preferred appeal to the Appellate Authority i.e. Regional Police Officer, Hazara. The Appellate Authority enhanced his punishment to major punishment of dismissal from service vide order Endst: No. 31214-16/PA, dated 26.11.2019.

Meeting of Appellate Board was held on 21.07.2020 wherein petitioner was heard in person.) During hearing petitioner denied the allegations leveled against him.

Serious allegations of supporting drug peddlers and timber smugglers were leveled against the petitioner and the same were proved during enquiry. The petitioner could not produce cogent evidence of his innocence. During his service, he has also attained 23 bad entries. His act of misconduct is very serious. Therefore, the Board decided that his petition is hereby rejected.

This order is issued with the approval by the Competent Authority.

1818 No. S/ 3248-33450.

NO: 200371 PA

Sd/-DR. ISHTIAQ AHMED, PSP/PPM Additional Inspector General of Police, HQrs: Khyber Pakhtunkhwa, Peshawar.

Copy of the above is forwarded to the:

20- 3-20201. Regional Police Officer, Hazara at Abbottabad. One Service Roll and one Fauji Missal Kolusontaining enquiry file of the above named Ex-FC received vide your office Memo: No. 188/PA, dated 02.01.2020 is returned herewith for your office record.

2. District Police Officer, Abbottabad.

The Regio

Dv. No.,

3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.

4. PA to Addi: IGP/HQrs: Khyber Pakhturkhwa, Peshawar.

3 J 5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.

6. PA to AIG/Legal, Khyber Pakhtunkhwa, Peshawar.

7. Office Supdt: E-IV CPO Peshawar.

(KASHIF ZÜLFIQAR) PSP (AIG/Establishment, For(Inspector General of Police, Khyber Pakhtunkhwa, Peshawar,

75226 S.No: 200 DBA No: BC No: Name of Advocate: ASSOCIATION 5 NP Lap 0170 antlery in Miken S.No: Date: m//m _ نوعیت مقدمہ: م<u>سروس ارر ا</u>_ ماعث تحريراً نكه: BRARY مقدمہ مندرجہ بالاعنوان میں اپنی طرف سے داسطے پیروی دجوابد ہی برائے پیشی یا تصدیفہ مقدمہ بمقام **اسر کر اُ**ما جرار کر کے لیے KI AN () INEQUA) شرائط پرد کیل مقرر کیا ہے کہ میں ہر پیشی پرخود یا بذریعہ مختار خاص رو بردعدالت حاضر ہوتا رہوں گا اور برد**قت** لکار کے جانے مقدمہ وکیل صاحب موصوف کواطلاع دے کر حاضرعدالت کروں گا۔اگر پیشی پر مظہر حاضر نہ ہوااور مقدمہ میر ی ضربن کی دجہ سے کسی طور کرمیر ے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر زمہ دار نہ ہوں گے نیز وکیل صاحب صکر مقام پچہر کی بحکہ جلادہ کہی جگہ یا تجہری کے اوقات ہے سیملے یا پیچھے یا بروز تعطیل پیردی کرنے کے زمہ دار نہ ہوں گےاور مقدمہ کچہری مرکم علادہ کی اور جگہ ساعت ہونے پر پابر ور تعطیل پا کچہری کے اوقات کے آگے پیچھے پیش ہونے یر مظہر کوکوئی نقصان پنچے تو اس کے زمہ دار پاس کے واسطے سی معادضہ کے ادا کرنے یا مختانہ کے واپس کرنے کے بھی صاحب موصوف زمه دارنه ، و خَلَّ - مجمع كُوكُل ساخته برداخته جناحب موصوف مثل كرده زات منظور دمقبول ، وكاادر صاحب موصوف كو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراح فی گرٹی ونظر ثانی آیٹیل بگرانی و ہر متم درخواست پر دستخط وتصدیق کرنے کا بھی اختیار ہوگاادرادرکسی تھم یا ڈگری کرانے ادر ہرتنم کارڈیپ دصول گرنے ادررسید دینے ادرداخل کرنے ادر ہرتنم کے بیان دینے ادر اس کے ثالثی دراضی نامہ و فیصلہ بر حلف کرنے اقبال دعویٰ دلینے کا بھی اختیار ہوگا اور بصورت جانے بیر دنجات از کچہری صدر ا پیل و برآمدگی مقدمہ پامنسوخی ڈگری بکطرفہ درخواست عظم امتناع کی قرق پا گرُفتار کی قبل از گرفتاری داجرائے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ مختانہ پیروی کا اغتیار ہوگا۔ادربصورت ضر درکے صاحب موصوف کو کی بھی اغتیار ہوگا کہ مقد مہ مزکوریاس کے کسی جز دکی کاردائی کے پابصورت اپیل کسی دوسرے دکیل کواپنے بجائے پالیتے چہراہ ہقرر کریں ادرایے دکیل کو بھی ہرامر میں وہی اور ویسے اختیارات حاصل ہوئے جیسے صاحب موصوف کو حاصل ہیں اور دوران کمقذمہ بتو کچھ ہر جانہ التوایزےگا دہ صاحب موصوف کاحق ہوگا۔اگروکیل صاحب موصوف کو پوری فیس تاریخ پیشی ہے (پہلے اوانہ کُرون گا تو موصوف کو یورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اورایسی صورت میں میرا کوئی مطالبہ کسی قشم کا صاحہ icepting lon Oo برخلاف نہیں ہوگا۔ لېذاوكالت نامدلكھ ديانى كەسندرىب تضمون دکالت نامدین لیاہے اوراجھی طرح سمجھ لیا ہےاوں منظور ہے۔ مورخه:

BEFORE HE HONORABI FRVICE F **IYBER PAKH** TRIBUNAL PESHAWAR CAMP COURT, ABBOTTABAD.

Service Appeal No. 10011/2020.

Abdul Qadeer, Ex-Constable No. 1446, District Police Abbottabad.

Appellant.

VERSUS

- 1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
- 2. Regional Police Officer, Hazara Region, Abbottabad.
- 3. District Police Officer, Abbottabad.
- 4. District Police Officer, Kohistan.

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Respondents

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Para wise comments on behalf of Respondent No. 1,2 & 3.

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1	Reply	-	1 to 3 ·	
2	Affidavit	-	4	
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DSP Legal, Abbottabad.

BEFORE THE HONORABLE SERVICE TRIBUNAI KP, PESHAWAR.

Service Appeal No. 10011/2020.

Abdul Qadeer, Ex-Constable No. 1446, District Police Abbottabad.

VERSUS

- 1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar
- 2. Regional Police Officer, Hazara Region, Abbottabad.
- 3. District Police Officer, Abbottabad.
- 4. District Police Officer, Kohistan.

Respondents

Appellant.

Para-wise comments by Respondent No. 1, 2 & 3.

Respectfully Sheweth;

PRELIMINARY OBJECTIONS:-

- 1. That the instant Service Appeal is not maintainable in the present form.
- 2. That the appellant is estopped by his own conduct to file the instant appeal.
- 3. That the appellant has not come to the Hon'ble Tribunal with clean hands.
- 4. That the appellant has suppressed material facts from the Hon'ble Tribunal.
- 5. That the instant Service Appeal is not maintainable for non-joinder/ miss-joinder of necessary parties.
- 6. That the instant Service Appeal is barred by law and limitation.

ON FACTS:-

1. The appellant while posted at Police Station Bagnotar badly indulged himself with drug peddlers and timber smugglers. The appellant being a member of Police force ought to eradicate drug peddlers and timber smugglers but unfortunately, he paved the ways to the social enemies for their nefarious designs. The official secret i.e. position of the Police mobile etc were disclosed by the appellant to the drug peddlers etc. All the actions of the appellant are impeachable in the eyes of law. Therefore, he was proceeded against departmentally and after fullfilling codal formalities, the respondent No.03 rightly awarded him with the punishment of "reduction from higher stage to the lower stage in the same time scale of page" with immediate effect.

1.

- 2. The replied to the final showcause notice was not satisfactory therefore, the same was not accepted by the respondents.
- 3. Incorrect. The respondent No.03 rightly awarded punishment as mentioned above.
- 4. Pertains to record.

- 5. Incorrect. The Respondent No. 2 (Regional Police Officer), well informed about the misconduct of the appellant, out rightly transfer the appellant to District Upper Kohistan vide OB No.8390-91, dated 29-03-2019.
- 6. Incorrect. The respondent No.02 while exercising his appellate powers, keeping in view the severity of his gross misconduct and its effects on the image of the Police enhanced the punishment to the dismissal from service.
- 7. Incorrect. Respondents have issued order of dismissal in accordance with facts, law/rules.

8. Pertains to record.

- 9. Incorrect. The reply to this para has already given in Para No.01' vide-supra.
- 10. Incorrect. The allegations leveled against the appellant were proved, therefore the appellant was rightly proceeded against departmentally by the respondents. It is also mentioning here that the service record of the appellant is tinted with bad entries.
- 11. Incorrect. Proper departmental inquiry was conducted by the respondent and after fullfilling the codal formalities, the appellant was awarded with punishment.
- 12. Incorrect. The whole service record of the appellant is dirty. There are numerous bad entries in his official record, presence of the appellant, in the Police department will not only pollute the department but also the society.
- 13. The orders of the respondents are true and correct. Hence, liable to be remained intact. The appellant approached the Hourable Tribunal with unsound grounds.

ON GROUNDS:-

- a. Incorrect, all the orders of the respondents are legal and in accordance with law/rules.
- b. Incorrect, all the codal formalities have been fulfilled by the respondents while treating the appellant.
- c. Incorrect, there is no violation of any rule/article/law by the respondents during Departmental Probe.
- d. Incorrect, answering respondents had taken action against the appellant as per

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- e. Incorrect, the prime duty of the Police is to eradicate criminals, social evils, drug peddlers and timber smugglers but the appellant instead of eradication, facilitated them. Therefore, he was rightly proceeded against departmentally.
- f. Incorrect, all the allegations leveled against appellant are genuine and duly proved during inquiry.
- g. ' Pertains to the personal record of appellant hence, needs no reply.
- h. Incorrect, the appeal is time barred and to entertain the same is merely killing the precious and valuable time of the Honourable Service Tribunal.

PRAYER.

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In view of above, it is most humbly prayed that the instant Service Appeal does not hold any legal force which may graciously be dismissed with costs.

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Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar. (Respondent No. 1)

Dy: Inspector General of Police, " Hazara Region, Abbottabad. (Respondent

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Vlice Officer, Abbottabad." (Respondent No. 3)

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BEFORE THE HONOR PAKHTU TRIBUN BER PAKHTUNKHWA, FLOIDAN Service Appeal No. 10011/2020. 5時 ţ

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		, å 1		(Respondent	No. 2)
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BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

VERSUS

- 1. Provincial Police Officer, KPK, Peshawar.
- 2. RPO Hazard Region, Abbottabad.
- 3. District Police Officer, Abbottabad...... (Respondents)

SERVICE APPEAL NO.10011/2020

PETITION FOR INCLUSION AS PARTY ON APPELLANT'S SIDE BEING PETITIONERS LEGAL HEIRS OF THE APPELLANT ABDUL QADEER (DECEASED) EX-CONSTABLE ABBOTTABAD POLICE.

Respectfully Sheweth:

- 1. That titled appeal is pending adjudication before this Honorable Service Tribunal and is fixed today for hearing.
- 2. That the appellant Abdul Qadeer Constable Police was husband of Petitioner No.1, while real father of petioner No.2&3 and Son of petitioners No. 4 & 5. Appellant during the pendencey of instant service appeal has passed away on 18-11-2021. (Death Certificate is attached as Annex-"A").
- 3. That the petitioners are legal heirs of the deceased Abdul Qadeer (Appellant). (Copies of CNICs and Form-B of the petitioners are attached as Annex-"B&C").
- 4. That the petitioners are entitled to receive service dues of the appellant/deceased Abdul Qadeer; hence petitioners need to be impleaded as party on appellant's side to defend titled appeal.

It is, therefore, humbly prayed that petitioners may graciously be impleaded as party on appellant/deceased's side being his legal heirs.

Through

(Mohammad Aslam Tanoli) Advocate High Court

at Haripur

Petitioners

HORNER AND TRADE

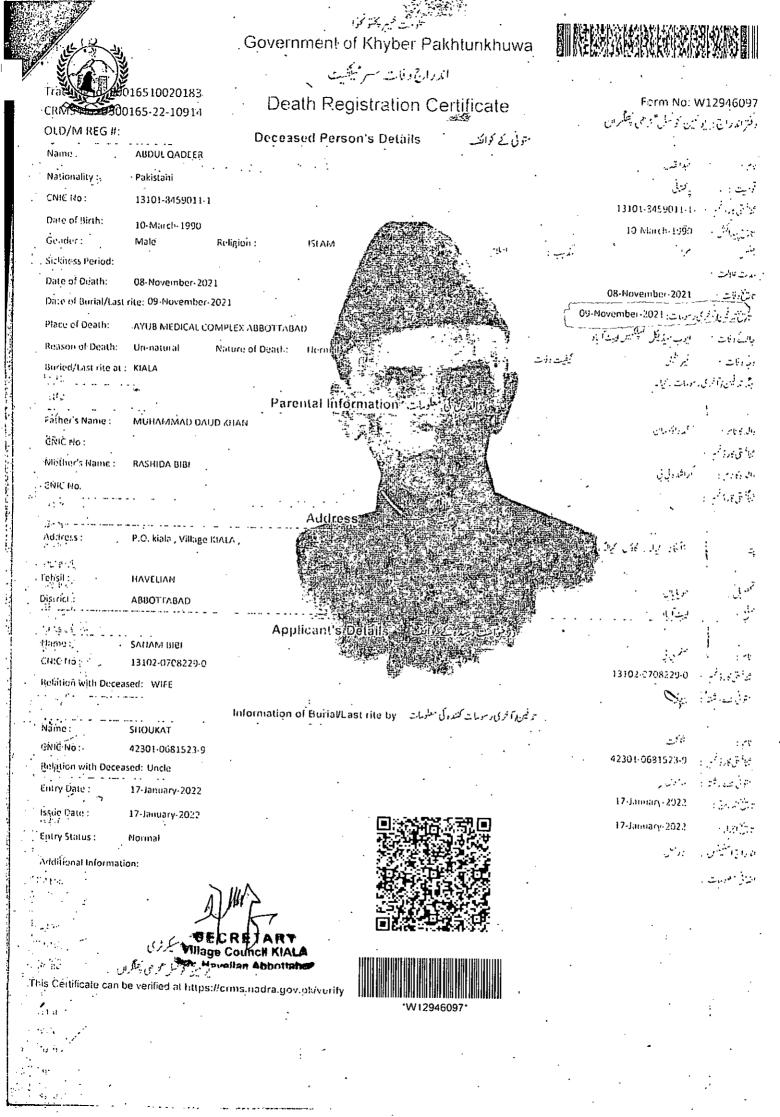
Dated 18-04-2022

AFFIDAVIT:

We (Muhammad Daud Khan etc) petitioners do hereby solemnly declare on oath that contents of this Petition are true and correct to the best of our knowledge and belief.

کرد او رفان Deponents/Petitioners

Dated: 18-04-2022



حكومت ياكستان نيشنل دُيثابيس اينڈ رجسٹريشن إتھار ٹی (وزارت داخلہ) المحارة بال سے كم عمر بجون كاستر سيكيث * درخواست د منده کا شناختی کار د نمبر 02-0708229-0 صم بي بي للمنظره كانام: بيدائش كاضلع باملك ا نمبر شار جنس ارشته بجيحكا نام اور رجستريش نمبر والدكانام ادر شناختي كارذنمبر معذوري تاريخ بدائش حويليال. ايبث آباد 67 عبدالقدم كوئي نسيس محرآ بيان 1 2019-05-21 13101-8459011-1 13102-0475445-9 لاكي مويليال.ايبث آباد عبدالقدر كۆڭى شىس زنیٹر من 2 2022-01-02 ينين 3102-0708229-0 13102-0717988-2 13101-8459011-1 1- اس فیلی کے بُندر جد بالا اتھارہ سال سے کم عمر 2 بچ / بچوں کا اندراج ہمارے ریکار دائی میں درج شده بيج كى عمر المحاره سال موقت من شاختى كار دفح مصول كيك در خواست حمق أروا -2 3. ای سرمینیکیٹ کو سنسجال کر رکھیں کیونکہ بجوں کے انھادہ سال کی عمر کو پہنچنے پر انی نُزْ به وزائيده بح كافورى طور بالدراج كروائيس ادر نيار جستريش سسر ميفيكيك حاصل كريم. 5- كوائف كى تدالى كى صورت ميں نيار جسٹريشن سىر سيفيكيد حاصل كريں-قرطارق الملح د سبتخط ر جسٹر ار جنرل 2022-04-15 JU كياله، تحصيل حويليان، ضلع ايب آباد 1310207082290 مر شیف درج بالا بی بجد می شاخت ادر مذکوره بالا کوانف و معلومات ثابت کر نے کیلیے قانوناً بروئے دفعہ (6) 8 نادراآ رڈی نیس بجریہ سنہ 2000 ، بطور شبوت قابل تبول ب

وكالت نامه بعدالت جناب حسب مع My KUK-Politioners <u>بر</u> بنام <u>وعز</u> 12/1pr دعویٰیاجرم <u>سیر دستر الل</u> باعث تحریک آنکه مندرجہ بالا عنوان کمیں اپنی طرف سے پیروی وجواہدی:۔۔۔ کر کر کے مقام م<u>ن عرب المرام من م</u>لر المراجع من شرط وكيل مقرر كياب من هر يبشى پرخود يابذ رعيه مختار خاص دوبر دعد الت حاضر ہوتار ہونگااور کوفت بکارے جانے وکیل صاحب موصوف کواطلاع دیکر جاضر کروں گا۔اگرکسی پیشی پر مظہر حاضر نه ہواا درغیر حاضری کی دجہ ہے کسی طور پر مقد مہ میر ےخلاف ہو گیا توصاحب موصوا سکے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ محسی اور جگہ کچہری کے مقررہ اوقات سے پہلے یابر در تعطیل پیروی کرنیکے مجاز نہ ہوئے۔ اگر مقدمہ مقام کچہری کے کسی اور جگہ ساعت ہونے پر یابر دز کچہری کے ادقات کے آگے یا پیچھے ہونے پر مظہر کوکوئی نقصان پہنچانو ذمہ داریاں اسکے داسطے سی معاوضہ ادا کرنے مختار نامہ دالی کرنے کے بھی صاف دموصوف ذمہ دارنہ ہوئے۔ بچھ کل ساختہ پر داختہ صاحب مثل کردہ ذات خود منظور و قبول ہوگا اورصاحب موصوف کو عرضی دعوی اور درخواست اجرائے ڈگری ونظر تانی اپیل نگرانی دائر کرنے نیز ہوشم کی درخواست پرد پنخطانصدیق کرنے کابھی اختیار ہوگا۔اورکسی تھم یا ڈگری کے اجراث کرانے اور ہوشم کاروپیہ وصول کرنے اوررسید دینے اور داخل کرنے کا ہود شم کا بیان دینے اروسپر د ثالثی وراضی نامہ و فیصلہ برخلاف کرنے و اقبال دعوى كااختيار موكااور بصورت اييل وبرآمد كى مقدمه يا منسوخى ذكرى يك طرف درخواست تظم امتناعى يا ڈ گری قبل از فیصلہ اجرائے ڈ گری بھی صاحب موصوف کر بشرط ادائیگی علیحدہ پیردی مختار نامہ کرنے کا مجاز ہوگا۔ ار بصورت ضرورت اپیل یا بیل کے داسطے سی دوسرے وکیل یا بیر سرکو بجائے اپنے ہمراہ مقرر کریں ادرا یے مشیر قانونی کوبھی اس امر میں وہی اختیارات حاصل ہو نگے جیسےصاحب موصوف کو پور**ی فین تاریخ پی**ش سے پہلےادانہ كرون كاتوصاحب موصوف كوبورا اختيار ہوگا كہ مقدمہ كى ہيروى نہ كريں ادرايس حالت ميں ميرامطالبہ صاحب موصوف کے برخلاف نہیں ہوگالہذ امختیار نامدلکھدیا ہے کہ سندرر ہے مضمون مختیار نامدین لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔ 18-041 الرقوم :<</20/ Mar (315)(1000) كردارك (دالر) 26,5015

oner.

OF THE REGIONAL POLICE OFFICER HAZARA REGION, ABBOTTABAD 0992-9310021-22 1999 1997 0992-9310023 💟 r.rpohazara@gmail.com 0345-9560687 312-13 / **P**A DATE 2-6 / 1/ /2019 NO:

ORDER

This order is bereby passed to dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhiva Police Rules, 1975 submitted by Constable Abdul Qadeer No. 1446 of District Upper Kohistan against the order of punishment i.e. Reduction from higher stage to lower stage in some time scale of pay awarded by District Police Officer, Abbottabad vide OB No. 59 dated 14.03.2019.

Facts leading to the punishment are that the official while posted at Police Station Bagnotar allegedly remained in league with drug peddlers and timber smugglers. He also kept informed the drug peddlers and timber smugglers whereabouts and the position of Police mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception:

After receiving his appeal, comments of DPO Abbottabad were obtained and examined/perused. The undersigned called the official in OR and heard him in person. As evidence is clear against the official and he failed to advance any plausible reason in his defence. Therefore in exercise of power conferred upon the undersigned under Rule 11-4 (c) of Khyber Pakhtunkhwa, Police Rules 1975, punishment awarded by DPO Abbottabad is hereby enhanced to major punishment of Dismissal from service with immediate effect.

Dr.Mazhar-ulhaq Kakakhel (PSP/PPM/S.St)

/2019.

-Sd-

No. 312-14-16 /PA, dated Abboitabad the 26-11 CC.

- The District Police Officer, Upper Kohistan for information and necessary action.
 The District Police Officer, Abbottabad with reference to his office Memo No 2. 2470/Legal dated 09-05-2019.
- 3. Establishment Branch

Office Superintendent For Regional Police-Officer Hazara-Region (Abbottabad)

Page 1 of 2

ORDER

In compliance with the order of worthy/Regional Police Officer, Hazara Region Abbottabad vide his office order Endst: No. 31213/PA, dated 26-11-2019. This order is hereby passed to dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhwa, Police Rule, 1975 submitted by constable <u>Abdul Qadeer No. 271/1446</u> of District Upper Kohistan against the order of punishment i.e. Reduction from higher stage to lower stage in same time scale of pay awarded by District Police Officer, Abbottabad vide OB No. 59, dated 14-03-2019.

Facts leading to the punishment are that the official while posted at Police Station Bagnotar allegedly remained in league with drug peddlers and timber smugglers. He also kept informed the drug peddlers and timer smugglers whereabouts and the position of Police mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception.

After receiving his appeal, comments of DPO Abbottabad were obtained and examined/perused. The undersigned called the official in OR and heard him in person. As evidence is clear against the official and he failed to advance any plausible reason in his defiance. Therefore, in exercise of power conferred upon the undersigned under Rule 11-4 (c) of Khyber Pakhtunkhwa, Police Rules 1975, punishment awarded by DPO Abbottabad is hereby enhanced to major punishment of *Dismissal from service* with immediate effect.

DB. No. 130 dated - 28/11/2019

(ABDUL/SABOOR KHAN)PSP

ADistrict Police Officer, Upper Kohistan

No. <u>1998</u> /OHC, dated Kohistan the <u>28</u> / <u>11</u> /2019.

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

- 1. The Regional Police Officer, Hazara Region, Abbottabad with reference to his office letter number quoted above, please.
- 2. Pay Officer DPO office Upper Kohistan.
- 3. SRC DPO office Upper Kohistan.

IN

(ABDUL SABOOR KHAN)PSP → District Police Officer, Upper Kohistan

<u>ORDER</u>

This office order will dispose of the departmental enquiry against **Constable Abdul Qadeer Khan No. 1446, the then Police Station Bagnotar.** He while posted at Police Station Bagnotar allegedly in league with drug peddlers and timber smugglers. He also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception. In this connection he was issued Show Cause Notice, his reply of Show Cause Notice found unsatisfactory.

1446

He was issued Charge Sheet along with statement of allegations. Mr. Abdul Aziz Khan Afridi, SP, Investigation, Abbottabad was appointed as Enquiry Officer. He conducted proper departmental enquiry against the delinquent officer and recorded statements of all concerned. After conducting proper departmental enquiry, the Enquiry Officer submitted his findings, wherein allegations have been proved against him. Consequently he was issued Final Show Cause Notice. He was summoned to appear in Orderly Room on 14-03-2019. He was given a patient hearing but he had nothing plausible to state in his defence.

Therefore, in exercise of the powers vested in the undersigned Police Disciplinary Rules-1975 (Amended 2014), I, Abbas Majeed Khan Marwat, PSP. District Police Officer, Abbottabad as a competent authority, am constrained to award him the punishment of <u>Reduction from higher stage to lower stage in the same time</u> <u>scale of pay</u> with immediate effect.

Order announced.

OB NOS9 14:3-19

Distr of Police Officer bottabad

1. 2. 3.

CC.

Establishment Assistant.

Pay Officer, DPO Office Abbottabad.

OHC alongwith complete Enquiry File containing $\frac{44}{44}$ pages for completion of record.

Constable Abdul Qadeer No. 1446 Name Police Lines Abbottabad Place of posting He while posted at Police Station Bagnotar allegedly in league with drug peddlers and timber smugglers. He also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out Allegations their illegal business without any fear of Police raid and interception. In this connection he was issued Show Cause Notice, his reply of Show Cause Notice found unsatisfactory. Mr. Abdul Aziz Khan Afridi SP Investigation (Enquiry officer) submitted its findings where Finding of allegations leveled against delinquent official have **Enquiry Officer** been proved and recommended for Major punishment. 03- NO-59 14-3-19 6.29 Last cham E appen **Decision by** competent authority Majer punishment of reduction John higher stage To lower stage in the same time scale of pry,

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26 جناب عالى!

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بحوالہ شمولہ فائین شوکا زنوش لیٹر نمبری 36/PA مجاریہ 2019-20-22 پر معروض خدمت ہونکہ ا^{کا} متحکہ ہو^ا بین میں 11 سال سے ملازمت کررہا ہے۔اور عرصہ قریب ایک سال سے تھانہ بکنو تر میں تعینات اور 07 افسرا نچارج صاحب تھانہ کے ساتھ اپنی ڈیوٹی اسی تھانہ میں سرانجام دے چکا ہوں ۔ ساکل اپنی پوری نوکری میں کبھی بھی بدنا می کاباعث نہ بنا ہے۔ بلکہ سابقہ تمام آفیسر من سائل کی Punchuality کی ہمیشہ زبانی تعریف کی ہے۔ساکل نے انتہائی ایما نداری کے ساتھ نوکری

اب جبکہ سائل کومند کرہ بالا فائنل شوکازنوٹس ملاہے جس کے مطابق سائل منشیات فروشوں کے ساتھ ملاپ رکھتا ہے۔ جبکہ بیالزام حقیقت کے بالکل برعکس ہے۔جس کے ثبوت کے طور پرمن سائل کی ڈیوٹی میں دلچیپی اورا یمانداری کی وجہ سے دیے گئے PA,9B,9C CNSA کے پر چبھی ملاحظہ کیے جاسکتے ہیں۔ اگر سائل کے منشیات فروشوں کے ساتھ ملاپ ہوتا تو انسداد منشیات FIRs میں معاونت نہ کرتا۔

جناب SHO صاحب نے جو دیڈیونیوت کے طور پر پیش کی ہے وہ حقیقت کے بالکل برعکس ہے۔جن اشخاص کو SHO صاحب نے منشات فروش بنایا ہے۔ وہ کو کی منشیات فروش نہ تھے بلکہ میر ے مخبر ہونے کے ساتھ ساتھ امدادی پولیس بھی تھے۔میر ےعلم میں نہیں تھا کہ ان کے ساتھ کو کی لڑکیاں بھی ہیں۔ بلکہ جس ٹائم وہ ہوٹل میں آئے اس وقت میں ایب آباد میں موجود تھا۔ جو کہ میر اSDR بھی ملاحظہ کیا جا سکتا ہے۔وقوعہ کے ٹائم میں تھا نہ میں موجود تھا۔

جناب SHO صاحب نے بیالزام لگایا ہے کہ وقوعہ کے ٹائم سرکاری موٹر سائیکل اور سرکاری وردی بھی برآ مدکی جبکہ سرکاری موٹر سائیکل میں یا کوئی بھی رائیڈرڈیوٹی کے بعد موٹر سائیکل سرکاری ہوٹل میں کھڑا کرتا تھا۔ چونکہ تھانہ کا راستہ نہایت خراب ہے ۔اور وردی جو SHO صاحب کو ملی وہ کنسٹیبل عثمان کی تھی ۔جسکا تھوڑ ے دن پہلے تبادلہ ہو گیا تھا۔ جوابی وردی کسی

ای طرح تمبر مظرز کے ساتھ بھی سائل کا کوئی تعلق یا رابطہ نہ ہے۔ اور نہ بی دوران تعیناتی سائل بھی بھی اس مکر دخ دھند ے میں ملوث افراد کے ساتھ اٹھنا بیٹھنا کیا ہے۔ سائل تھا نہ بلتوتر جو کہ روڈ ہے کافی ہٹ کر ہے تعینات ہے جبکہ مین روڈ پر چوک ہرنو داقع ہے۔ اگر سائل تھا نہ کی حدود سے ٹمبر سمگر کی مدد کرتا ہے تو ہرنو چوکی اور فارسٹ برئیر سے کٹر کیسے گز رجاتی ہے۔ سائل حلفا بیانی ہے کسی بھی غیر قانونی کام کرنے والے سے ساتھ سائل کا کوئی بھی تعلق نہ ہے۔ ماز کوئی بھی تعلق نہ ہے۔ پولیس تجربے طور پر جانتا ہے اور تعلق ہے استد عام کیہ فائینل شوکا ز داخل دفتر فرمایا جاؤے۔

سأتل كنسييل عيدالقد مرتم بر 1446 متعينه يوليس لائن جنلع ايبث آباد المرتوم 26-02-2019

OFFICE OF THE DISTRICT POLICE OFFICER, ABBOTTABAI No: 36 /PA, Dated Abbottabad, the 31/02/2019.

FINAL SHOW CAUSE NOTICE (Unit Rule (3) KPK Police Rules, 1975)

- 1. That you **Constable Abdul Qadeer No. 1446 Police Lines Abhottabad**, rendered yourself liable to be proceeded under Rule 5 (3) of the Khyber Pakhtunkhwa Police Rules 1975 for following misconduct;
 - ⁷. You while posted at Police Station Bagnotar allegedly in league with drug peddlers and timber smugglers. You also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception. In this connection you were issued Show Cause Notice, your reply of Show Cause Notice found unsatisfactory, hence this charge sheet and statement of allegations.

II. During proper departmental enquiry the allegations have been proved against you.

- 2. That by reason of above, as sufficient material is placed before the undersigned therefore it is decided to proceed against you in general Police proceedings without aid of enquiry officer:
- 3. That the misconduct on your part is prejudicial to good order of discipline in the Police force.
- officers;
- 5. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the Rules.
- You are, therefore, called upon to Final Show Cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 for the misconduct referred to above.
- 7. You should submit reply to this Final Show Cause Notice within 07 days of the receipt of the notice failing which an ex parte action shall be taken against you.

District Police Officer Abbottabad

- 8. You are further directed to inform the undersigned that you wish to be heard in person or not.
- 9. C. unds of action are also enclosed with this notice.

Received by Dated /___/2018.

OFFICE OF THE DISTRICT POLICE OFFICER, ABBOTTABAD

No:36 /PA, Dated Abbottabad, the J/ / 0_/2019.

GROUNDS OF ACTION

That you Constable Abdul Qadeer No. 1446 Police Lines Abbottabad, committed following misconduct:-

- I. You while posted at Police Station Baguotar allegedly in league with drug peddlers and timber smugglers. You also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception. In this connection you were issued Show Cause Notice, your reply of Show Cause Notice found unsatisfactory, hence this charge sheet and statement of allegations.
- II. During proper departmental enquiry the allegations have been proved against you. By reasons of above you have rendered yourself liable to be proceeded under Khyber Pakhtunkhwa Police Rules, 1975, hence these grounds of action.

District Police Officer Abbottabad

OFFICE OF THE DISTRICT POLICE OFFICER, ABBOTTABAD No: 36 /PA, Dated Abbottabad, the 31 /02 /2019.

FINAL SHOW CAUSE NOTICE (Unit Rule (3) KPK Police Rules, 1975)

- 1. That you **Constable Abdul Qadeer No. 1446 Police Lines Abbottabad**, rendered yourself liable to be proceeded under Rule 5 (3) of the Khyber Pakhtunkhwa Police Rules 1975 for following misconduct;
 - You while posted at Police Station Bagnotar allegedly in league with drug peddlers and timber smugglers. You also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception. In this connection you were issued Show Cause Notice, your reply of Show Cause Notice found unsatisfactory, hence this charge sheet and statement of allegations.

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- 2. That by reason of above, as sufficient material is placed before the undersigned therefore it is decided to proceed against you in general Police proceedings without aid of enquiry officer;
- 3. That the misconduct on your part is prejudicial to good order of discipline in the Police force.
- That your retention in the police force will amount to encouragement of inefficient Police officers;
- 5. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the Rules.
- 6. You are, therefore, called upon to Final Show Cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 for the misconduct referred to above.
- 7. You should submit reply to this Final Show Cause Notice within 07 days of the receipt of the notice failing which an ex parte action shall be taken against you.
- 8. You are further directed to inform the undersigned that you wish to be heard in person or not.
- 9. U. unds of action are also enclosed with this notice.

- Joolul Qade Received by Dated <u>22/02</u>/2019.

Distric ice Officer bbottabad

OFFICE OF THE DISTRICT POLICE OFFICER, ABBOTTABAD No:56 /PA, Dated Abbottabad, the 51 / 2019.

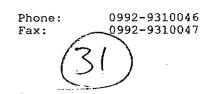
GROUNDS OF ACTION

That you Constable Abdul Qadeer No. 1446 Police Lines Abbottabad, committed following misconduct:-

- I. You while posted at Police Station Bagnotar allegedly in league with drug peddlers and timber smugglers. You also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception. In this connection you were issued Show Cause Notice, your reply of Show Cause Notice found unsatisfactory, hence this charge sheet and statement of allegations.
- II. During proper departmental enquiry the allegations have been proved against you. By reasons of above you have rendered yourself liable to be proceeded under Khyber Pakhtunkhwa Police Rules, 1975, hence these grounds of action.

CA 1 **District** Police Officer Abbottabad





Office of the Superintendent of Police, Investigation Abbottabad.

No:	83	PA/Inv: dated Abbottabad the, $3/103/2019$
To:	The	District Police Officer, Abbottabad.

Subject:

DEPARTMENTAL ENQUIRY AGAINST CONSTABLE ABDUL QADEER NO: 1446, POLICE LINES, ABBOTTABAD.

Memo:

Kindly refer to your good office Endst No: 706/PA dated 01-01-2019 on the subject cited above.

Enclosed kindly find herewith a departmental enquiry report in respect of Constable Abdul Qadeer No: 1446 of Police Lines, Abbottabad, for favour of kind perusal please.

Superintendent of Police, Investigation, Abbottabad.

DEPARTMENTAL ENQUIRY AGAINST FC ABDUL QADEER NO 1446, POLICE LINES, ABBOTTABAD.

ALLEGATIONS:-

Vide charge sheet & summary of allegations No: 706/PA dated 01-01-2019 issued by your good office for the purpose of scrutinizing the conduct of FC Abdul Qadeer No: 1446 with the allegations that "He while posted at Police Station Bagnoter allegedly in league with drug peddlers and timber smugglers. He also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without any fear of police raid and interception. In this connection he was issued Show Cause Notice, reply of which was found un-satisfactory, hence this charge sheet and statement of allegations".

Instant enquiry was marked to Additional Superintendent of Police, Abbottabad for purpose of scrutinizing the conduct of delinquent official, who after completing proceedings submitted his findings vide his office Memo No: 73/PA dated 04-02-2019. The same was marked to undersigned with the remarks to re-enquire the matter vide your good office Memo No: 504/PA dated 06-02-2019.

PROCEEDINGS:-

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> After the receipt of enquiry papers the record was thoroughly examined and the delinquent official was heard in person. The following official / civilians were called upon / summoned in the office of undersigned, their statements were recorded which are placed on file.

- 1. Inspector Qamar Zaman SHO PS Bagnoter.
- 2. MHC Raja Haroon, Moharrar PS Bagnoter.
- 3. Muhammad Qadeer s/o Muhammad Bashir r/o Kayala Bagnoter.
- 4. Shakir Khan Jadoon s/o Goher Rehman Jadoon r/o Dodhal Nawansher.
- 5. Constable Abdul Qadeer No: 1446 of Police Lines, Abbottabad (accused Official).

Service Record of FC Abdul Qadeer was minutely examined which was not found satisfactory. However after the perusal of record / statements of all concerned the CDR of the accused official was also obtained in which accused official was also found in contact with accused of the case vide FIR No: 364 dated 21-11-2018 u/s 371-A/371-B/9-B CNSA / 3 /4 EHO PS Bagnoter. During the course of enquiry all the officials / civilians have taken the plea that:-

1. STATEMENT OF INSPECTOR QAMAR ZAMAN SHO PS BAGNOTER.

He corroborated / supported the version of his statement which he already given before Additional Superintendent of Police, Abbottabad that on 21-11-2018 during search / checking of shama hotel situated at top of Bagnoter, from the room of hotel suspect i.e Ahmer s/o Ejaz, Ahmer s/o Riaz r/o Salhad, Mst. Mussarat Bibi d/o Azad and Shazia d/o Anmol r/o Lahor were caught having illegal activity. Resultantly a case vide FIR No: 364 /2018 u/s 371-A/371-B/9-B CNSA / 3/ 4 EHO PS Bagnoter was registered. The accused of the case during enquiry disclosed that all the arrangements / facilities were provided by Constable Qadeer whereas, alcohol and Charas recovered from their possession was also provided by said constable, out of which some quantity has been taken away by constable qadeer. He further stated that during search official uniform of constable and official Motor Cycle was also recovered from the hotel which indirectly proves that the said constable has reciprocal affiliation / relationships with narcotic sellers etc.

2. STATEMENT OF MHC RAJA HAROON MOHARRAR PS BAGNOTER

MHC Raja Haroon Moharrar PS Bagnoter stated in his statement that Constable Abdul Qadeer No: 1446 performed rider duty in PS. As per routine he after completing patrolling duty turn up to PS Bagnoter. On the day of occurrence / incident he said FC was present in Police Station while he was also residing in PS. SHO Police Station sent Murrasla to PS upon which a proper case under relevant sections of law was registered.

3. <u>STATEMENT OF MUHAMMAD QADEER S/O MUHAMMAD</u> <u>BASHIR CASTE KARLAL R/O KAYALA BAGNOTER,</u> <u>ABBOTTABAD.</u>

He stated in his statement that he being owner of Shama Hotel made agreement of 01 year of lease with one Shakir alias Lucky r/o Dhodyal Nawansher. He is working as a welder from 01 and half and has a shop of welding near Shama Hotel. On 20-11-2018 while he was busy in his routine work in the meanwhile constable abdul qadeer parked his official motor cycle in shama hotel, thereafter he moved toward Police station and he went to his house. He was

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unaware of hotel managements and disclosed that all the arrangement were responsibility of one Shakir. Later on, next day he came to knew that earlier night SHO made raid on hotel and few peoples were taken to PS where a case was also registered against them. Further he did not know about the mater.

4. <u>STATEMENT OF SHAKIR JADOON S/O GOHER REHMAN</u> JADOON R/O DODHAL NAWANSHER.

He stated in his statement that he acquired Shama Hotel Bagnoter on lease for a period of 01 year from one Muhammad Qadeer s/o Muhammad Bashir and the amount of lease Rs/- 01 Lac and 20 thousands has been paid by him. On 20-11-2018 while he was present in the Kitchen of Shama Hotel, at evening time SHO PS Bagnoter along with other officials came into hotel and started search / abusive language while the necessary entry of residents was made accordingly. During search he was threatened / black mail by SHO who also took twenty thousand from him. Before that week SHO brought 02 ladies by himself in the hotel. All the officials of PS Bagnoter are parking their official motor cycles in the hotel as the path of PS is not good. He disclosed that during search SHO PS Bagnoter took his entry register and 01 heater with him which are not returned till yet. He disclosed that he did not know the persons who were captured by the police neither he was aware about any addictive thing.

5. <u>STATEMENT OF CONSTABLE ABDUL QADEER NO 1446</u> <u>PRESENTLY POLICE LINES, ABBOTTABAD.</u>

He also supported his version of statement which he already submitted before the Additional Superintendent of Police, Abbottabad. He disclosed that he remained posted in PS Bagnoter from last 01 year and had-a service of 11 years in his credit. During his posting he performed his duty honestly and is punctual in his duty. He also denied the allegation of affiliation with / facilitation to narcotic sellers and smugglers as per charge sheet & summary of allegations. Furthermore, he remained posted in PS as rider while he has not performed his duty on police mobile which shows that he has no idea about the position of police mobile and he did not indulged himself in any illegal activity. He also denied the allegations of involvement with timber smugglers whereas, Forest Barrier & CCTV Camera are also installed in Harno which can speak his innocence. He further insisted that he had not involved himself in any illegal activity and prayed for justice.

CONSLUSION:-

Keeping in view of above facts & circumstances it has been observed that:-

1. FC Abdul Qadeer being aware of whole matter having mutual consensus with owner of hotel & captured accused of the case vide FIR No: 364 dated 21-11-2018 u/s 371-A/371-B /9B-CNSA / 3 /4 EHO PS Bagnoter is held responsible for this kind of un-lawful act.

- 2. From the perusal of record I am agreed from the enquiry conducted by Additional Superintendent of Police, Abbottabad vide his office Memo No: 73/PA dated 04-02-2019, with regard to involvement of accused official.
- 3. As per CDR of the accused official he remained in contact with the charged accused in the aforementioned FIR. Whereas, he also admitted / confessed during cross examination that he was in contact / aware of whole matter.
- The service record of the accused official was checked which was not found good and he was also found willfully absent from special duty on the day of occurrence i.e 21-11-2018 for which he was also awarded punishment of one day leave without pay.

During Cross examination the owner of the shama hotel disclosed that he handed over the gratification to SHO on the spot by taking fifty percent amount from accused official as a loan, which indirectly speaks that they have close relationship. On the other hand accused official disclosed that the captured accused remained his spy.

In the light of above facts and from the perusal of record the involvement of accused official in the matter is found genuine / correct. Being member of discipline force he was not required to take part, indulge himself in any illegal activity. Therefore, constable Abdul Qadeer No: 1446 (delinquent official) is found guilty of the charges as per record. Hence, he is recommended for Major punishment.

Submitted please.

(ABDUL AZIZ AFRIDI) Superintendent of Police, Investigation, Abbottabad.

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الله المالي المعالي أج ربيا عقر عام محري ك الفاسين مردن الله المارين المالي أج ربيا عقر عام المري كار الفاسين مردن ى. كوتى بى محرف المغون فى تحقي تسى أيسى كا د المرا منجرة توتى س، كما ايت كمينار لرديون من يكس موري مات صري ر - 150.00 س : مرز رفتوضی آب ستم موس مل -- 6402 i C ما ، مور سانسل ریاری سے مالی تو اتھا -· · · · مع مع مد مع ما معلى ما الكرم الم UL: 1 - 2 - 19 7 - 2 - 19 بنورى اس نسنتن عسيز لغرير 19 - 2 - 19

بان اذان الم قرزمان معکم تحار الو تر مان الرور فرا كردوران جملته مثل شموسول مكنو فركا - كو در كا - حر كارو -معان ا مرور الحاز - المرول من المان الر الم ماة مردان وخترازاد مترابر مليكى عار وختر انتول تتركا مور كاخر القريم 3/4Ema 18 18 در الا مان الم المر الم الم المرابي فر الحالي الم الم الم الم الم مسكى - فراب و ترس در مرض و ترا م در الم الم الم الدر الم الم الم الم الم مراب قدرانى بولى اللكار لى يى معدران تدى كره در كره ى The a Contract (Const Contract of a contraction of the Contraction of Bind - Educh المجرزين فلي المحاج المنو مرالي Alesie

بان آزان مسال خان حدمن ولد مور اعان خان صد من وان تمر ونعود ال میانی صولام میں نے مشہر حوک مانو تر کو مسی محمد تدر ولد محمد بس سے اسال کی لیز ہے ہے رکھا ہے اور ایس الا کو ہ جرار آم لیزی کرت میں اوا کر میکا معون - مورض 8-11-10 مور ایسے حقیق کے کچن عین عو تو دی کر مفر یے تعد 40 کلیوتر محمد ملازم حوش میں ایک اور تاریشی مربع كردى سابحة حالم علوج مردى مردى حبك تمام كرد المصبى رسى والولى كالغرى المحلي لملي محل معد الم المسل حدث المسل مع المرام وم حوا اور ملاحق مين محص كليب میں بیا اور محو سے 55% رویے بھی تی ہے۔ اس سے آیے بعد میں 642 صاحب خود 20 مؤدمان حوص ميلرات عقب مما ملام تعامة م النب تما مرواری مور ساتشل وزر وبال معمد فرق صب کیوند مقات کا دستر خراب س مندم به الم منا ملاطات الب مور ساتعل ما الم التص جد وتر وي ملاز منى فعر م) میں میں اس عقب ملک معان البور الممن سے معم میں المری رحب ادر آیے میں ان ساعظ مل جلے نے ور اس ی دانے کا سالنے حلَّيًا بياتى حول كر مكرف مان والى لرد ي كونم مين مانت هو) ارد آس الم الم كورى شداد من موت الم الم من العلم معا مي مراسان م - Stating Con Ul di مسکر: نوس مشهر د مون بال × × سوالات بزرم أمر المر المرحات متاركان 15-2-19 2.2 سوان ، حوالي كر دوران أمي حوش سے خديران كى مركزان ، 86 6 7755 - 119:0 مردی اور مواز سا شعل مرام می می در ای ورست سے مردی وردی تدر میں شعل مرام میں میں در ایک سے میں مراح مراح ج

××سى: كلياكمنى مدير ايت حرك مين ريائيس بذير مينى تما اور أب مسل ج المسكل عبدالقرم مر معوك مين راي في مرد بل تقا حب من دمات دیا میں -ج اور میں اور میں جامل موں میں سے میڈی ان سے مہلے موں ملاتا ت موجلی ج ، کی اور میں نے فور الملی محدہ دیا مقا -۲۰ سما: ایسے حوال عسین رسنے درائے محرم میں میں سراحی وحرج می حرب میں ای ۲۰ وہ ایسے سا تقریبلرائے حول کے اور براید سندہ یوش (grads) سبب کی تق ۲۰ خیلی احملی یونل نہ معنی البنہ جرس خلیص میے -«سی، آب هو کی که تمک تر معملات می زمیر دار هیس تو میسی ایسی غل مولات مېراب خە تۈرىيوں ىزرىمى -ج د مرو مدینے محیف آیسے باسی اسی وی جی مرحمی اور مرو دینے مربعر ویاں تلامی کرنا نامیکن سے ۔ مدس د آیسے سامت کے بیشے توک منٹہ مرتبہ صبی اور تعیال کے دیانی ملی ۔ ج : ایت میں اور ایت ورکر مقا اسی مقت اور و مرد ایک کا مردوسی ملے اور معاولی سکریت و فسور مطرف (تعالی مردیکا حول مدسی لا تعسیس عبدال تدریر ادر اسمی علاوہ پولسی سے ملاز کر ایسے عول عیر رہائن بن حول تسر امیں وردی وعرف میل کا حجو ڈیاتے حسی کیا کہ درست سے ج . جى منى جر فرست من من من من مرام موت والى دردى من ل من ك من ج : تقاسر منفی کم مازموں موسی جان حوں ا «»» من « Ho is is in un me her her and ler in is her in the sho 10, 19, 15 - 2 - 19. سائر فان ميدن

4) 12' Sai and a sai min and the Wisi We we (13) میانی مولم شعع مولی میری دانی اللب سے جو مرحدت ت مرفق الی کنه وهودیال تو ایت سال ی اس بردا هوای - میں تغرب المال مع ولم التي عول اور معرفي في ال ت حوال ما ي المحل سا ي مح من ال- 11- 26 و مد ابن دخان مر خل منا مح من من عبد الدير في الما مرا الما مرا مالك مستح موثل مبرى مولكر مرفح و مقارزى طرف مالكريا، جمع معرف التي تحكى كالم ف الانه حول - حول ت موات را الم الم الم الم الم الم الم المحاص إمال الما عير والرفح الرفع والرفع مولا رات و ملاحقات في عوام مارا اور تحر وول في سابق فرف الار 101 417 200 30 Jun 20 - Jun 20 - Jun 201 - 2 Eug 2 2 2 0 2 M-aller Aurain Just Japan E Tour Long is 12-2-19 00 C344-9502936 2

ALL_TYPE	MSISDN_ID	STRT_TM	BNUMBER		SECS		SITE_ADDRESS
II - Outgoing	923365391993	11/09/2018 09:43:23	03157669355		14	355550081090010	St-3, Maki Muhalah Kehal near WAPDA house, Abbottabad
- Incoming	923365391993	11/09/2018 10:19:26	3135952340	0	18	355550081090010	Chitta Pul, Lower Malik Poora, Abbottabad
- Incoming	923365391993	11/09/2018 10:29:57	0992850022	0	29	355550081090010	Chitta Pul, Lower Malik Poora, Abbottabad
- Outgr 1g	923365391993	11/09/2018 10:33:42	03138007117	0	51	355550081090010	Chitta Pul, Lower Malik Poora, Abbottabad
- Incon.ing	23365391993	11/09/2018 10:40:47	3365852256	0	26	355550081090010	Abbottabad Upper Malikpura, Near Sabzl Mandi, Abbottabad
Outgoing	(923365391993	11/09/2018 10:45:40	03419861386	0	29	355550081090010	Abbottabad Upper Malikpura, Near Sabzi Mandi, Abbottabad
Outgoing	923365391993	11/09/2018 11:04:33	03428972912	0	33	355550081090010	Abbottabad Upper Malikpura, Near Sabzi Mandi, Abbottabad
Incoming	923365391993	11/09/2018 11:39:04	3110863343	0	36	355550081090010	H#1974, Karim Pura, Abbottabad
- Incoming	923365391993	11/09/2018 11:53:26	3319093844	0	48	355550081090010	New Sarafa Motti Bazar, Abbottabad City
- Outgoing	923365391993	11/09/2018 12:06:32	3115086192	2	22	355550081090010	NTC building Abbatabad
I - Outgoing	923365391993	11/09/2018 12:12:40	3439193100	2	20	355550081090010	H#1974, Karim Pura, Abbottabad
- Incoming	923365391993	11/09/2018 12:33:58	3157669355	0		355550081090010	Kunj Qadeem, Near Water Tank, Abbottabad
- Incoming	923365391993	11/09/2018 14:03:02	3479754870	1		355550081090010	NTC building Abbatabad
- Incoming		11/09/2018 14:58:05	3157669355	0	46	355550081090010	H#1974, Karim Pura, Abbottabad
- Outgoing		11/09/2018 15:43:50	03144468606	1		355550081090010	H#1974, Karim Pura, Abbottabad
- Outgoing	923365391993	11/09/2018 16:24:28	03419861386			355550081090010	Sultan Hotel, Main Bazar, Abbottabad City
Incoming		11/09/2018 16:28:50	3419861386			355550081090010	Chitta Pul, Lower Malik Poora, Abbottabad
- Outgoing	923365391993	11/09/2018 16:32:45	03115606451			355550081090010	Chitta Pul, Lower Malik Poora, Abbottabad
- Outgoing	923365391993	11/09/2018 17:29:28	03125382753	0	28	355550081090010	Ameer Moaviya Chok Main bazar havelian KPK
Outgoing		11709/2018 17:31:54	03125382753	0	9	355550081090010	Near PTCL tower Kokal Barsin Havellian Abbottabad
- Incoming		11/09/2018 17:46:38	3157669355			355550081090010	Ameer Moaviya Chok Main bazar havelian KPK
- Incoming		11/09/2018 17:58:17	3110863343			355550081090010	Khata no 329 khasra no 1862,1837,1861 situated at Revepue Estate Havakan tehsil Havalian distt Abottabad.
- Incoming	923365391993	11/09/2018 18:55:25	3115653702			355550081090010	Village Sajikot Harlpur
Incoming		11/09/2018 19:56:30	3115617603	0		355550081090010	Village Sajikot Haripur
- Outgoing		11/09/2018 19:59:02	03147755698	1		355550081090010	Village Sajikot Haripur
- Incoming		11/10/2018 10:38:20	0992850022	0	39	355550081090010	Village Sajikot Haripur
- Incoming	923365391993	11/10/2018 11:09:49	3115653702	0	53	355550081090010	Village Sajikot Haripur
Incoming	923365391993	11/10/2018 11:57:47	3144468606	1	43	355550081090010	Ameer Moaviya Chok Main bazar havelian KPK
Incoming		11/10/2018 12:35:50	3110863343	0	38	355550081090010	Chitta Pul, Lower Malik Poora, Abbottabad
Outgoing		11/10/2018 12:51:54	03110863343	0	15	355550081090010	H#1974, Karim Pura, Abbottabad
- Outgoing	923365391993	11/10/2018 13:36:50	03135866572	0	17	355550081090010	LAL KHAN HARNAO MORA KALAN DHERI, Abbottabad
- Incoming		11/10/2018 13:37:32	3135866572	0		355550081090010	LAL KHAN HARNAO MORA KALAN DHERI, Abbottabad
- Outgoing		11/10/2018 15:42:32	03469586273	1		355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Incoming	<u>.</u>	11/10/2018 16:47:08	3115653702	0	34	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Outgoing	<u>.</u>	11/10/2018 17:54:55	03168831114	0	38	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
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Outgoing		11/10/2018 17:57:47	03167321186	-		355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Outgoing		11/10/2018 18:00:54	03499438196		39	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
- Outgoing		11/10/2018 18:05:58	03145113612	_	13	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
- Outgoing		11/10/2018 19:12:06	03035867710	-	42	355550081090010	H#TC-877-2,Near Bazar wali Masjid, Nawan Shehar Abbottabad
Incoming		11/20/2018 11:32:46	0992850022	1	6	355550081090010	Mouhalla Qazi Sahib, Dhamtore, Abbottabad
Outgoing		11/20/2018 11:36:52	03157669355	.	23	355550081090010	H#TC-877-2,Near Bazar wali Masjid, Nawan Shehar Abbottabad
- Incoming		11/20/2018 11:40:08	3144468606			355550081090010	Village Shlekal Bandi, Abbottabad
- Incoming	923365391993	11/20/2018 11:57:39	3135866572		16	355550081090010	Sultan Hotel, Main Bazar, Abbottabad City
- Outgoing	923365391993	11/20/2018 12:34:04	03135866572	<u> </u>		355550081090010	Kunj Qadeem, Near Water Tank, Abbottabad
- Outgoing	923365391993	11/20/2018 13:08:38	03144468606			355550081090010	Kunj Qadeem, Near Water Tank, Abbottabad
Outgoing	923365391993	11/20/2018 15:47:30	03365222700				Sultan Hotel, Main Bazar, Abbottabad City
- Incoming		11/20/2018 15:49:21	3129217033	the second se		and a second	Sultan Hotel, Main Bazar, Abbottabad City Sultan Hotel, Main Bazar, Abbottabad City
Outgoing		11/20/2018 15:51:40	03147755698	-			Abbottabad Upper Malikpura, Near Sabzi Mandi, Abbottabad
Outgoing		11/20/2018 15:58:52	03135858984				Village Shiekal Bandi, Abbottabad
	the second se	11/20/2018 15:58:52					Village Shlekal Bandi, Abbottabad
Outgoing		11/20/2018 16:00:12	03147755698				
Incoming			3144468606				Garrhi Panna Chowk Nawa Shehr Murree Road Abbottabad
Incoming		11/20/2018 16:28:12	3325086316	-			LAL KHAN HARNAO MORA KALAN DHERI, Abbottabad
Outgoing Outgoing		11/20/2018 16:41:44	03135866572			355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Outgoing		11/20/2018 16:44:49	03235904237				Bandi Mera Mouhalla Tharada, Abbottabad
Incoming		11/20/2018 16:45:20	3129217033		_		Bandi Mera Mouhalla Tharada, Abbottabad
Outgoins		11/20/2018 17:00:58					Randi Mera Mouhala Tharada, Abbottabad
- Incomins		11/20/2018 17:25:58					sendi Mera Mouhalla Tharada, Abbettabad
 Incoming 	923365301955	11/20/2018 17:50:34	3115653702	0	10	355550081090010	Bandi mera Mouhalla Tharada, Abberrabad
	<u> </u>		, ``				· · · · · · · · · · · · · · · · · · ·
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Call - Incoming	923365391993	11/20/2018 18:02:02	3168814526	1	26	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Call - Incoming	923365391993	11/20/2018 18:33:59	3144468606	10	34	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Call - Incoming	923365391993	11/20/2018 18:42:22	3409204203	0	51	355550081090010	Bandi Mera Mouhalia Tharada, Abbottabad
Call - Outgold	923365391993	11/20/2018 19:23:19	03135866572	0	18	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Call - Incoming	923365391993	11/20/2018 19:36:49	3144468606	0	23	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Call - Incon.ing	923365391993	11/20/2018 20:09:46	3135866572	1	54	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Call - Outgoing	23365391993	11/20/2018 20:37:17	03115653702	3	25	355550081090010	Bandi Mera Mouhalia Tharada, Abbottabad
Call - Incoming	923365391993	11/20/2018 20:42:07	3129217033	1	45	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Call - Outgoing	923365391993	11/20/2018 20:44:12	03147755698	0	22	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Call - Outgoing	923365391993	11/20/2018 20:46:10	03115606451	28	4	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Call - Incoming	923365391993	11/20/2018 21:35:45	3135866572	0	44	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Call - Outgoing	923365391993	11/20/2018 21:36:57	03129217033	2	33	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Call - Outgoing	923365391993	11/20/2018 21:40:29	03147755698	0	10	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Call - Outgoing	923365391993	11/20/2018 21:40:57	03147755698	0	40	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
Call - Outgoing	923365391993	11/20/2018 21:41:48	03129217033	0	26	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
all - Incoming	923365391993	11/20/2018 21:53:09	3147755698	0	32	355550081090010	Bandi Mera Mouhalia Tharada, Abbottabad
all - Incoming	923365391993	11/20/2018 22:33:40	3115653702	1	47	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
all - Outgoing	923365391993	11/20/2018 22:37:58	03115653702	0	55	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
all - Outgoing	923365391993	11/20/2018 22:44:16	03115653702	0	17	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
all - incoming	923365391993	11/20/2018 22:45:32	3115653702	jo	52	355550081090010	Bandi Mera Mouhalla Tharada, Abbottabad
all - Incoming	923365391993	01/29/2019 18:09:15	3459569962	2	31	355550081090010	Tehsil & Distt Abbotabad, Village Rajola , Mohallaha Salman Zal
all - Outgoing	923365391993	01/29/2019 19:36:05	03235703238	0	13	355550081090010	Village Sajikot Haripur
all - Incoming	923365391993	01/29/2019 19:48:33	3157669355	1	22	355550081090010	Village Sajikot Haripur
all - Outgoing	923365391993	01/30/2019 11:43:36	03216486089	1	7	355550081090010	Village Sajikot Haripur
all - Outgoing	923365391993	01/30/2019 11:56:11	03155482092	0	4	355550081090010	Village Sajikot Haripur
all - Outgoing	923365391993	01/30/2019 12:32:39	03216486089	3	58	355550081090010	Village Sajikot Haripur
all - Incoming	923365391993	01/30/2019 12:52:57	3115627586	2	11 -	355550081090010	Village Sajikot Harlpur
all - Incoming	923365391993	01/30/2019 14:57:27	3144468606	0	45	355550081090010	Village Sajikot Haripur
ail - Outgoing	923365391993	01/30/2019 14:59:38	03216486089	1	4	355550081090010	Village Sajikot Harlpur
all - Outgoing	923365391993	01/30/2019 15:27:07	03239825620	0	28	355550081090010	Village Sajikot Haripur
all - Incoming	923365391993	01/30/2019 21:34:15	3167322374	0	23	355550081090010	Village Sajikot Haripur
all - Outgoing	923365391993	01/31/2019 09:17:07	03121161547	6	26	355550081090010	Village Sajikot Haripur
all - Incoming	923365391993	01/31/2019 09:46:32	3038177955	0	34	355550081090010	Village Sajikot Haripur
all - Incoming	923365391993	01/31/2019 09:48:08	3115292823	1	43	355550081090010	Village Sajikot Harlpur
all - Incoming	923365391993	01/31/2019 10:31:37	3078971197	1	<u>j</u> 3	355550081090010	Ameer Moaviya Chok Main bazar havelian KPK
all - Incoming	923365391993	01/31/2019 10:50:10	3038177955	0	37	355550081090010	Ameer Moaviya Chok Main bazar havelian KPK
Call - Incoming	923365391993	01/31/2019 10:51:47	3038177955	0	12	355550081090010	Ameer Moaviya Chok Main bazar havelian KPK
all - Incoming	923365391993	01/31/2019 11:15:03	3115606451	0	28	355550081090010	situated at Revenue Estate Havalian tehsil Havalian distt Abottabad.

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SUBNO	,B_SUBNO	A_TRANSDATE	ME	DURATIO N	CELL_ID	DESCRIPTION	OPER
215626945	3219582677	11/15/2018 0:00	16:18:16		9.23006E+12	RUR0778S_Sajikot_ME2777 Abbottabad_Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
215626945	3328932812	11/15/2018 0:00	16:48:40	51	9.23005E+12	SLD1866 S BandiAtaiKhan Abbottabad Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
215626945	3328932812	11/15/2018 0:00	17:04:02	49	9.23006E+12	SLD1866 S BandiAtaiKhan Abbottabad Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
2156263.5	3:528932812	11/15/2018 0:00	17:12:11	25	9.23006E+12	RUR0778 S Sajikot ME2777 Abbottabad Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
215626945	3078971197	11/16/2018 0:00	11:37:10	217	9.23006E+12	SLD1866 S BandiAtaiKhan Abbottabad, Bural Abbottabad Tehsil Abbottabad Kyber Pakhtuokhwa	Outgoing CALL
15626945	3032438624	11/16/2018 0:00	14:17:12	55	9.23006E+12	SLD1866 S BandiAtaiKhan Abbottabad Rural Abbottabad Yehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
215626945	3211559363	11/16/2018 0:00	14:18:15	274	9.23006E+12	RUR0778 S Salikot ME2777 Abbottabad Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
15626945	3032438624	11/16/2018 0:00	14:54:54	12	9.23006E+12	RUR0778 S Sajikot ME2777 Abbottabad Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
15626945	3235703238	11/16/2018 0:00	15:03:27	18	9.23006E+12	SLD1866 S BandiAtaiKhan Abbottabad Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
215626945	3235703238	11/16/2018 0:00	15:19:31	12	9.23006E+12	RUR0778_S_Sajikot_ME2777 Abbottabad_Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
215626945	3038145870	11/16/2018 0:00	17:56:08	23	9.23006E+12	SLD1866S_BandiAtaiKhan Abbottabad_Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
15626945	3219582677	11/16/2018 8:56	8:56:52	97			
15626945	3245024887	11/16/2018 14:30	14:30:46	15			Incoming call
15626945	3218580448	11/18/2018 12:27	12:27:03	44			Incoming call
15626945	3218580448	11/18/2018 13:11	13:11:25	16			Incoming call
5626945	3218580448	11/18/2018 15:28	15:28:44	71			Incoming call
5626945	3005000467	11/19/2018 0:00	18.50.11		9.230062-12	NTHOIS S Sokar village Bandi Mora ward ADEFESSA ALE-MAL J AMELIA TO THE ANTERSTRATE	Incoming call
5626945	3245024887	11/21/2018 13:42	13-47-50	64	J.23000ET12	NTH0197S_Sokar_village_Bandi_Mera warid_MR555382 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing.CALL
56269451	3779517004	11/23/2018 9:15	9:15:07				Incoming call
5676020	3220512004	11/23/2018 9:28	9:15:07	61			Incoming call
56260/21	2725312004	11/23/2010 3:28	3:28:44	51			Incoming call
520543	3233703238	11/23/2018 20:40	20:40:58	78		· · · · · · · · · · · · · · · · · · ·	Incoming call
2020945	3233703238	11/23/2018 21:24	21:24:20	148			Incoming call
.3020345	3219848423	11/23/2018 21:31	21:31:23	178			Incoming call
5626945	3212657493	11/23/2018 21:41	21:41:00	105			Incoming call
5626945	3235703238	11/23/2018 23:03	23:03:43	54			Incoming call
5626945	3219848423	11/23/2018 23:04	23:04:32	260			Incoming call
5626945	3225745411	11/24/2018 0:00	18:24:29	71	9.23006E+12	IVL2123S_Hawailian_Bridge_355309 Abbottabad_Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
5626945	3211559363	11/24/2018 0:00	18:26:11	24	9.23006E+12	IVL2123S_Hawailian_Bridge_355309 Abbottabad_Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
5626945	3235703238	11/24/2018 9:17	9:17:15	107			Incoming call
626945	3229512004	11/24/2018 10:21	10:21:13	26			Incoming call
5626945 [3219848423	11/24/2018 12:05	12.05.23	68			Incoming call
5626945	3229367165	11/24/2018 17:37	17:37:49	15			Incoming call
5626945	3018171525	11/24/2018 17:55	17:55:18	169			
5626945	3235547058	11/24/2018 19:05	19:05:24	25			Incoming call
626945	3439193100	11/25/2018 0:00	13:06:22		9.23006F+12	BT1042P_SarbanChowk Abbottabad Abbottabad Tehsil ABBOTTABAD KPK	Incoming call
5626945	3245024887		9:07:56	78			Outgoing CALL
5626945	3219848423	11/25/2018 19:59	19:59:42	14			Incoming call
5626945	3219848423	11/25/2018 20:03	20.03.00	147			Incoming call
5626945	3005619342	11/26/2018 0:00	11 15 30		9 220058-12	101865 5 Dandistajkhan Abbattahad Dural Abbattahad Yala? Abbattahad Yala?	Incoming call
5626945	3005619342	11/26/2018 0:00	12 22 121		0 72000ET12	LD18655_BandiAtaiKhan Abbottabad_Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa BT08825_Malik Pura Abbottabad Abbottabad Tehsil ABBOTTABAD KPK	Outgoing CALL
5626945	3225745411	11/26/2018 0:00	10.00.00	21	9.230006712/	01002Winin Furd AUDOLLADED ADOCTADAD LENSI ABSOLIABAD KYK	Outgoing CALL
626945	3005645726	11/26/2018 0:00	-21-12-02		5.25000E+12	LD1866S_BandiAtaiKhan Abbottabad_Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
5626042	3225450201	11/26/2018 18:54	10.54.22		3.2300000+12	LD1866S_BandiAtaiKhan Abbottabad_Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
676012	2072071107	11/27/2018 0:00		183	0.5300000.45		Incoming call
67607E	20702/112/		8:37:32		3.250002+12	UR07785_Sajikot_ME2777 Abbottabad_Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
C20343	30/83/119/	11/2//2018 0:00	9:45:26	53	9.23006E+12	LD1866S_BandiAtaiKhan Abbottabad_Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CAL
020945 .	10100101111	11/27/2018 0:00	10:40:59	44	9.23006E+12	VL2501 S Mohallah Sarwari Kabristan Moor HV3384 Abbottabad Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunk	Outgoing CALL
626945	3328932812	11/27/2018 0:00	10:49:00	45	9.23006E+12[5	LD1866S_BandiAtaiKhan Abbottabad_Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
020945	5528932812	11/27/2018 0:00	10:50:11	16	9.23006E+12 5	LD1866 S BandiAtaiKhan Abbottabad Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
26945	3225745411	11/27/2018 0:00	15:07:22	41 1	9.23006E+12 S	LD1866 S BandiAtaiKhan Abbottabad Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
26945	3459561696	11/27/2018 0:00	16:42:34	60	9.23006E+12 F	VL2123_S_Hawailian_Bridge_355309 Abbottabad_Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing SMS
26945	3459561696	11/27/2018 0:00	16:44:04	33 1	9.23006E+12 H	VL2123 S Hawailian Bridge 355309 Abbottabad Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
26945	3145093138	11/27/2018 0:00	16:45:24	143	9.23006E+12 H	VL2123S_Hawailian_Bridge_355309 Abbottabad_Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
626945	3145093138	11/27/2018 0:00	16:52:52	60 9	9.23006E+12 S	D3865 S Salhad Abbotabd warid MDAB3371 Abbottabad Abbottabad Tehsil ABBOTABAD KPK	
626945	3145093138	11/27/2018 0:00	16:54:16	60	9.23006E+12	D3865_S_Salhad_Abbotabd warid_MDAB3371 Abbottabad Abbottabad Tehsil AbbottabaD KPK	Outgoing SMS
	3145093138	11/27/2018 0:00	16:57:18	60	9.23006E+12	D3865S_Salhad_Abbotabd warid_MDA83371 Abbottabad Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS Outgoing SMS
5626945							ICOTROIDS MAN

215626	5 3145093138	11/27/2018 0:00	17:01:20	60	9.23006E+12 SLD386	S_Salhad_Abbotabd warid_MDAB3371 Abbottabad Abbottabad Tehsil ABBOTABAD KPK	Dutgoing SMS
		11/27/2018 0:00		·. 25	9.23006E+12 (ABT088	S Malik Pura Abbottabad Abbottabad Tehsil ABBOTTABAD KPK	Outgoing CALL
321562694	5 3145093138	11/27/2018 0:00	17:09:49	12	9.23006E+12 ABT104	P_SarbanChowk Abbottabad Abbottabad Tehsil ABBOTTABAD KPK	Outgoing CALL
321562694	5 3469583848	11/27/2018 0:00	18:18:02	19	9.23006E+12 ABT186	5 BanniTownship Abbottabad Abbottabad Tehsil ABBOTTABAD KPK	Outgoing CALL
212020	51 3249043103	11/27/2018 0:00	18:29:38	32	9.23006E+12 ABT186	S_BanniTownship Abbottabad Abbottabad Tehsil ABBOTTABAD KPK	Outgoing CALL
321302034	5 2125/45411	11/27/2018 0:00	19:12:22	39	9.23006E+12 ABT186	S_BanniTownship Abbottabad Abbottabad Tehsil ABBOTTABAD KPK	Outgoing CALL
321562694	5 3135858984	11/27/2018 0:00	19:44:20	134	9.23006E+12 ABT1869	S BanniTownship Abbottabad Abbottabad Tehsil ABBOTTABAD KPK	Outgoing CALL
		11/27/2018 0:00		390	9.23006E+12 HWY015	6S_Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing CALL
		11/27/2018 16:42		27			Incoming call
		11/28/2018 0:00		60	9.23006E+12 HWY015	6S_MoorKalian waridMR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS
221202094	5 514//55698	11/28/2018 0:00		60	9.23006E+12 HWY015	6S_Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS
521502094.	51 3147755698	11/28/2018 0:00	1:47:47	60	9.23006E+12 HWY015	5S_Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS
321362694	5 3147755698	11/28/2018 0:00		60	9.23006E+12 HWY015	SS_Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS
321302094	3147755698	11/28/2018 0:00	1:50:17	601	9.23006E+12 HWY015	SS_Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS
321302094	5 3139443445	11/28/2018 0:00	2:47:20	60	9.23006E+12 HWY015	S_Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS
321562694	5 31/5589224	11/28/2018 0:00	2:56:54	60	9.23006E+12 HWY015	S_Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS
21302094	51/5589224	11/28/2018 0:00		60	9.23006E+12 HWY015	S_Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SM5
		11/28/2018 0:00	3:21:21	60	9.23006E+12 HWY015	S_Moor_Kalian warld_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS
		11/28/2018 0:00	5:30:55	60	9.23006E+12 HWY015	S_Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS
		11/28/2018 0:00	5:32:03	60	_9.23006E+12 HWY015	5_Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS
21302094	31/3589224	11/28/2018 0:00 11/28/2018 0:00	5:32:42	60	9.23005E+12 HWY015	S_Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SM5
21302094	31/3389224		5:33:22	60	9.23006E+12 HWY015	5_Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS
21202034	31/3389224	11/28/2018 0:00 11/28/2018 0:00	5:34:16	60	9.23005E+12 HWY015	S_Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS
213020343	31/3589224	11/28/2018 0:00	5:34:34		9.23006E+12 HWY015		Outgoing SMS
213020342	3175585224	11/28/2018 0:00	5:35:14	60	9.23006E+12 HWY015	S_Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS
213020343	2172209224	11/28/2018 0:00	5:36:02	601	9.23006E+12 HWY015		Outgoing SMS
213020942	1 3175589224	11/28/2018 0:00	5:36:42	60	9.23006E+12 HWY015		Outgoing SMS
213626943	3175565224	11/28/2018 0:00	5:37:18	601	9.23006E+12 HWY015	S_Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS
215626045	2175509224	11/28/2018 0:00	5:37:44	60	5.25000E+12 HWY0150	5_Moor_Kallan warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing SMS
215626045	3175305224	11/28/2018 0:00	5:38:30 5:39:06	00	9.25000E+12 HWY015		Outgoing SMS
215626043	3175505224	11/28/2018 0:00	5:39:06	201	9.23000E+12 MWY0150		Outgoing SMS
215626045	3175580257	11/28/2018 0:00	5:39:49	201	5.200000112 INW 10150		Outgoing SMS
		11/28/2018 0:00	5:40:47		3.23000E+12 (N1H0197		
		11/28/2018 0:00	9:16:41	172	2.2.50002+12 INTHU197	S_Sokar_village_Bandi_Mera warid_MR555382 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KP	
215626945	3249043103		20:34:52		3.230002+12 mw10150	S Moor_Kalian warid_MR555383 Abbottabad_Rural Abbottabad Tehsil ABBOTABAD KPK	Outgoing CALL
215626945	3749043103		20:34:32	121	9.23000E+12 (NUKU//8	Sajikot_ME2777 Abbottabad_Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL
	1 3243043103	11/20/2010 0:00	21:10:48	121	9.23000E+12 KUKU//8	_S_Sajikot_ME2777 Abbottabad_Rural Abbottabad Tehsil Abbottabad Kyber Pakhtunkhwa	Outgoing CALL

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OFFICER ABBOTTABAD Ph: No: 0992-9310026, Fx: No: 0992-9310025 <u>atdpolice@gmail.com</u> No. <u>504</u>/PA Dated. <u>6</u>/<u>2</u>/2019

To:

The Superintendent of Police, Investigation, Abbottabad

Subject:-

DEPARTMENTAL ENQUIRIES AGAINST CONSTABLE ABDUL QADEER NO. 1446

Memo:

Departmental Enquiry against FC Abdul Qadeer No. 1446 conducted by Addl: SP Abbottabad received in this office. The Worthy District Police Officer, Abbottabad recorded following remarks:-

SP, Investigation Abbottabad

"I don't agree with the findings of E.O as the punishment does not commensurate with the crime of official. SP, Investigation to re-enquire"

130.1 OS

District Police Officer Abbottabad

Page 1 of 1



The

Phone No: 0992-9310029 Fax No: 0992-9310025

Addl: Superintendent of Police, Abbottabad.

W/District Police Officer,

Abbottabad.

To: The

From:

No. 73/104

DEPARTMENTAL ENQUIRY

/Dated Abbottabad the OY/ o2 /2019.

Memo:

Subject:

Kindly refer to your good office Endst: No.706/PA dated

01-01-2019.

It is submitted that Departmental enquiry conducted against Constable Qadeer No.1446 is attached herewith for kind perusal please.

Addl: Superintendent of Police, Abbottabad.

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FINDING OF DEPARTMENTAL ENQUIRY CONDUCTED AGAINST CONSTABLE QADEER NO.1446 OF POLICE LINES ABBOTTABAD

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BRIEF OF ALLEGATIONS:

A departmental enquiry was received by the W/District Police Officer. Abbottabad against Constable Qadeer No.1446 of Police Lines Abbottabad vide Endst: No.706/PA dated 01-01-2019 with the statement of the allegations that "*He while posted at Police Station Bagnotar allegedly in league with drug peddlers and timber smugglers. He also kept the drug paddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception. In this connection he was issued show cause notice, his reply of show cause Notice found unsatisfactory, hence this charge sheet and statement of allegations".*

PROCEEDINGS:

Undersigned summoned the defaulter official, recorded his statement and collected all the documentary evidences in light of summery of allegations.

FINDINGS:

01. During enquiry, it was learnt that on 21-11-2018 during search SHO Qamar Zaman at Shama Hotel Bagnotar, arrested one accused and registered case vide FIR No.364 dated 21-11-2018 u/s 371A-371-B/9B-CNSA/³/₄ EHO PS Bagnotar. During investigation accused disclosed that Constable Qadeer facilitated them. SHO also took into position uniform of Constable Qadeer as well his motorcycle was also parked in front of said Hotel, which indicates that delinquent official was also present in the hotel.

02. As regard to the charges that, delinquent official was in contact with the charged accused in the aforementioned FIR. He himself confessed that Ahmer Riaz s/o Riaz Ahmed r/o Upper Salhad contacted him for provision of a room and accused is his informer.

03. Keeping in view of above circumstances, delinquent official is found guilty in light of allegations mentioned in the summery. The undersigned recommend him for major punishment i.e "*time to pay scale Constable*" please.

Submitted for favour of kind perusal.

ADDL: SUPERINTENDENT OF POLICE, ABBOTTABAD.

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CHARGE SHEET

I Abbas Majeed Khan Marwat (PSP) District Police Officer
 Abbottabad as competent authority hereby charge you <u>Constable Abdul Qadeer No.</u>
 <u>1446 Police Lines Abbottabad</u> as explained in the attached statement of allegations.

You appear to be guilty of misconduct under Police Disciplinary Rules
 1975, and have rendered yourself liable to all or any of the penalties specified in the said
 Police Disciplinary Rules.

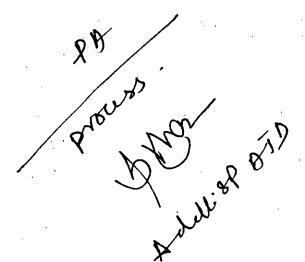
3). You are therefore, directed to submit your written defense within seven days on the receipt of this Charge Sheet in the Enquiry Officer.

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

5). Intimate whether you desire to be heard in person or otherwise.

6). A statement of allegations is enclosed.

Abbas Maje d Khan Marwat, PSP Istrict Police Officer Abbottabad



Page 1 of 2

DISCIPLINARY ACTION

I Abbas Majced Khan Marwat (PSP) District Police Officer Abbottabad as Competent Authority of the opinion that you <u>Constable Abdul Qadeer</u> <u>No. 1446 Police Lines Abbottabad</u> rendered yourself liable to be proceeded against as you committed the following act/omission within the meaning of Police Disciplinary Rules 1975.

STATEMENT OF THE ALLEGATIONS

1). You while posted at Police Station Bagnotar allegedly in league with drug peddlers and timber smugglers. You also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception. In this connection you were issued Show Cause Notice, your reply of Show Cause Notice found unsatisfactory, hence this charge sheet and statement of allegations.

For the purpose of scrutinizing your conduct with reference to the above allegations, <u>Ms. Sonia Shamroz Addl: SP Abbottabad</u> is appointed as Enquiry Officer.

3). The Enquiry Officer shall in accordance with the provision of this ordinance, provide reasonable opportunity of hearing to the accused, record finding and make within 25 days of the receipt of this order, recommendation as to punishment or the appropriate action the accused.

4). The accused a well conversant representative of departmental shall in the proceedings on the date, time and place fixed by the Enquiry Officer.

/PA, Dated Abbottabad the Ø

Abbas Majed Khan Marwat, PSP District Police Officer bbottabad

No: 706

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CC:

Constable Abdul Qadeer No. 1446 Police Lines Abbottabad, with the direction to submit his defense within 07 days of the receipt of this statement of allegations and also to appear before the Enquiry Officer of the date, time and place fixed for the purpose of departmental proceedings.

Constable Abdul Qadeer No. 1446 the then PS Bagnotar Name Police Lines Abbottabad Place of posting He while posted at Police Station Bagnotar allegedly in league with drug peddlers and timber smugglers. He also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and Allegations facilitated them to carry out their illegal business without any fear of Police raid and interception. 1 1 1 1 1 Decision by competent by authority

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جا بيالى . ور محوار مر و گرد زر آف را ندن ایر نری مه / 664 می "/ 30 مرحموض خدوف بول مم مان فر مرك مول من ال سال سه مازرد ار السع. ورع مدفق بها الماس ساحمان بالموتر من كفينات امر تغريبا (ادر الجارج مامان كما ي ت الحد رمني فريدي السى تحافظي سراغام خرجه في مسالم فري فرى فرا لا تردان و بن نا ب الما نوار ۵ سے وركا كا ب ا- جي ما كومنذ و مالا تومازو م مالي من ع جس ت مالي من -خور في اور ممبر معلز من مدر رفقام - جنب الزام مقيقت عالموا المركن سے میں عظیم ہے کم مر من سال کا ڈیرٹی میں دلیسی اور ایا مزار کا کا دیم سے دی ت المح مدر جو تأحو النه ار منتبات Firs من معاد في و كا -مشيع معكر المح ج مالي فر كالولى لعاق فإرابع ما 2. او با الح في حدان لصيناتي منها جي جي اس مكره حضر من مد فرف ازار ي ما تعاليف سيما ب م - معل تمان بلو تر جر ارو م مع مان سف اح فسان ج م من من او ق جرجونى برنو وافق مع أكر من لاي تاعد وس مر معدرى مرد و عالي برنو وى امر ما بين بير بر سے ماد كي ، جاتى -من من مان من من من من من من مان ما من ولا يا الله من ط ولى في ل ن ج معامل کی ماری بینی سے رنواز کی رائی جر ما وال ما مر جو بر منبع بالا م بینی الزامات سے بری رہنی تو اردما جاتے ، مر السا میں جی بین مندج بالإ ميكي الزاما حس مرى اللى وأردم جان مال د ميدالفد وغبر 1446 متصد تولي لافتر است أما د

OFFICE OF THE DISTRICT POLICE OFFICER, ABBOTTABAD

No. 664 /PA, Dated Abbottabad, 11. 301 11. /2018

<u>SHOW CAUSE NOTICE</u> (Unit Rule (3) KPK Police Russ, 1975)

- 1. That you **Constable Abdul Qadcer No. 1446 PS B:** gnotar, have rendered yourself liable to be proceeded under Rule 5 (3) of the Khyber Fakhtunkhwa Police Rules 1975 for following misconduct;
 - 1. You while posted at Police Station Bagnovar allegedly in league with drug peddlers and timber snugglers. You also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception.
- That by reason of above, as sufficient material is placed before the undersigned therefore it is decided to proceed against you in general Police proceedings without aid of Enquiry Officer;
- 3. That the misconduct on your part is prejudicial to good order of discipline in the Police force.
- 4. That your retention in the police force will amount to procouragement of inefficient and indiscipline officer in the force.
- 5. That by taking cognizance of the matter under enduiry, the undersigned as Competent Authority under the said Rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the Rules.
- 6. You are, therefore, called upon to Show Cause as to they you should not be dealt in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 for the misconduct referred above.
- 7. You shall submit reply to this Slow Cause Notice within 07 days of the receipt of the notice failing which an ex parte action shall be takening oust you.
- 8. You are further directed to inform the undersigned that whether you wish to be heard in person or not.
- 9. Grounds of action are also enclosed with this notice.

Received by _____ Dated / /2018.

istrict Police Officer Abottabad

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(52)

OFFICE OF THE DISTRICT POLICE OFFICER, ABBOTTABAD

No. 664 /PA, Dated Abbottabad, the 304/1/ 12018

GROUNDS OF ACTION

That you Constable Abdul Qadeer No. 1446 PS Bagnetar, committed following misconduct:-

I. You while posted at Police Station Bagnotar allegedly in league with drug peddlers and timber smugglers. You also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without my fear of Police raid and interception.x

By reasons of above you have rendered yourself liable to as proceeded under Khyber Pakhtunkhwa Police Rules, 1975, hence these grounds of action.

Øfficer olice Distret Ablottabad

No. <u>669</u>/PA, Dated Abbottabad, the <u>30/11</u>/2018 <u>SHOW CAUSE NOTICE</u> (Unit Rule (3) KPK Police Rules, 1975)

- 1. That you **Constable Abdul Qadeer No. 1446 PS Bagnotar**, have rendered yourself liable to be proceeded under Rule 5 (3) of the Khyber Pakhtunkhwa Police Rule's 1975 for following misconduct;
 - 1. You while posted at Police Station Bagnotar allegedly in league with drug peddlers and timber smugglers. You also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception.
- 2. That by reason of above, as sufficient material is placed before the undersigned therefore it is decided to proceed against you in general Police proceedings without aid of Enquiry Officer:
- 3. That the misconduct on your part is prejudicial to good order of discipline in the Police force.
- 4. That your retention in the police force will amount to encouragement of inefficient and indiscipline officer in the force.
- 5. That by taking cognizance of the matter under enquiry, the undersigned as Competent Authority under the said Rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the Rules.
- 6. You are, therefore, called upon to Show Cause as to why you should not be dealt in accordance with the Khyber Pakhtunkhwa Police Rules. 1975 for the misconduct referred above.
- 7. You shall submit reply to this Show Cause Notice within 07 days of the receipt of the notice failing which an ex parte action shall be taken against you.
- 8. You are further directed to inform the undersigned that whether you wish to be heard in person or not.
- 9. Grounds of action are also enclosed with this notice.

Jade 1440 Received by /2018.

istrict Police Officer Apportabad

OFFICE OF THE DISTRICT POLICE OFFICER, ABBOTTABAD

No. 6/2 /PA, Dated Abbottabad, the 30 / 11_/2018

GROUNDS OF ACTION

That you Constable Abdul Qadeer No. 1446 PS Bagnotar, committed following misconduct:-

1. You while posted at Police Station Bagnotar allegedly in league with drug peddlers and timber smugglers. You also kept the drug peddlers and timber smugglers aware about the position of Police Mobile and facilitated them to carry out their illegal business without any fear of Police raid and interception.x

By reasons of above you have rendered yourself liable to be proceeded under Khyber Pakhtunkhwa Police Rules, 1975, hence these grounds of action.

Ø olice Officer District Abbottabad

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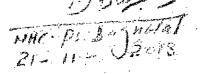
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 \mathcal{P} 55)-isleyte . حواله مسموله خارج تثريث و خسطة ا المش لير غيرى ١٩/٢٥ في ١٩ -١٥ -١٥ مردور قاعت موں تم مال فراج بدلین میں مرحم () سال سے مارض کر دیا ہے اور مرح قر الك سال س دخام كمن مين تعينات اور لقريمًا (انسر الحال ماهيان دخام عدا فر ابنا و فوا اسما قتام میران انجام د جما مورا. سال دودان تعدانی میں دورا فیران بت والج علك مايت ايا لارى عساقرابنا وين الفي مرافع معالق عام المراجان ما حمان نقام i ساع & خراق مو و جري ار بامال المعدم ف عقد ف ا توبي ا ج جنار معالی .-رب جیل سائل کو منذکر بالا چارج شیٹ مل سے جس کے مطالق سائل منشیات فرم شوں اور - اسلام حققت کر بالکا ، معکس بے جس کے عمر سود ن مان ولفظ ج جملہ برالزام حقیقت کا اس بر مکس بع جون ک شون نے طور بیم من سائل کا ڈیون میں درخوں کا میں دیت کے A. 9B.9C در بی کر اس میں مربع الله الم الله جا مرائع . الرسائل منتبات فرمترون 2 سائع مراب در الوسائل كور اجرا النبط مشيات FIR's ميل معاومات م كرما. -illerio عرم ایک سال کا تعیناتی میں سال نے داخر ڈرگشت کام اور نیارت ایما تداری کے ساتھ ایما ڈال مراغام دور مای در اس تعدانی که دوران سالی یک جرا و مالی مرحد اول س ما و الكرساني في حريبي بري ورين كابي نين ج تعسرا عي كو حريا على كا بورليس كا كوا بدا بو الكر الم ترجد حوط على 20 يعزلين كما يتدنين موظ تقا توسط كى من غير مالونى كمام كرغ و2 - e sti 2/2 Jen 18! (1) Fracalitate 2 -سال ماغیر سقارز کا سانق (م) کوئی تعلق نم ہے۔ اور شرع دوران تعینالی اس قسم کا طرور د مورو والروائع سائد الحفاظ معني وهما يو . سائل تعام كرز مون تعيدان ها جرم دوز مع کافی برا کرم چیک دیں ڈمز بر چرکی بر واقع ج حواں بر To کی جو بی نوب! اور در ای با در این کرد بع اگر سالی تقانی درد بع غرار معارز کا مدر ایج تفرچوی بر اور خارس ، برا س مد کی گرر جاتی تو -: 44 10 سائل حلفاً برانی روید کمرواجر خبر قرارو اکران کام کی واج کے سابق سائل کارونی بعد لواق نہ ج حعاد کر در ار کو این سے انگرا شرحا کر این حباک سر سائل کو العاف دیتے سوئے وزر ج سال پر بدار از عالت سے برحدال اس قرار دیل حال سانی ... کشیل معالفت الم46 منتقد لولین لرکی در اترا ر 08 <u>c/</u> <u>63</u> 21

بان اون المشرقه زمان ملك تحاشر لمنو ترسي بان لا لرور الم 12 تعدوران جملته سال شموسول مكنو فرال - كو جل كر - و كرو -عان المرولدالجاز - المروليريان المنان بر المد ماة فرتى دخد آزاد سراير مير، عزير دختر انبول خدلا مور كخر القرار «رطونت بيان» برسي مريزاي و الم منظم المريدي والم مسلم . مراب و سرس در تسرعره بی ول زار زار دی جراس = - 12 2 Ming & - 2 , 21 - 21/ we (2 , 2) - 1, 1, 1, 1, 1, 2) - 1, 1, 1) مروس مراجع من منظر منظرى من مراج وجود بال. حس المرى سراجيكم فاجره مراجع المسل فروس المرى من مرد الطن م- سرا المرجزران في المحط م الموس الم Alesie

01/51 البيش إلاد وقت وقواسم RI 15 فانت 00:05 4 364 د مربع با الله مرجم 21 11 مربع با الله مربع بالله مربع بالمربع بالمربع بالمربع بالمربع بالمربع بالله مربع بالله مربع بالله مربع بالله مربع بالله ب بالله بال The sto بر سرى حراسا رور مر کا مرحد ب المسلى لا بوقت عسر تمريرى فراس مد ترم مريد مدرجه طانبار 2 مدد الم مر مرجوم وعدان مر مرز ال من مرز المعا فر المرتز المدور فيروج 2 3 4 1 3 min in 192 3 1 3 1 4 1 5 7 7 2 4 1 7 7 2 4 1 5 2 5 2 3 min 10 2 5 2 5 3 min 10 سرارى مسب هدايت احسر بالالسلام جلاي حرار دوفت مسر بعد الع توسرا لاجرا مودان مستنب هوعمل فنأسي بالا تستعربه كالت تسور متسر بسرى الواديين تسرعره المحدود رالا بسر دستان دى جو ايد فروان العرط ف دد دارة مول جو مدي مرديا فر مرد مي تسابي بلم مرم الم الم الدان الركاني بر بنهاد عن الله يو م ف مرد مر م بنا براند الله الله الم الم المان عن المرى في الدر دونون مدون عدد مان دعى سامة معلى مردوفو فى مدر ا دلیس اور دونوال Sting در مع ما بعد نشار بید میں میں مران مری او فاق . در بافت مر مددرة مواجدت عاناتم مد اجرود اعاز الدستر فرد فالبرسان بلا عدر مذ مر المحاشرى ماين نام هم المعالي الم محالي حصر تم و د خان سر المر مدينه مولا المسطر معسب بيل بر من من عابنا تام احموه، بافن المد فوم حول سوا بر سراله، اس عساق لي شرى ما بدا نام مسالة تنازير وغير اميرك جار ج دم مرسين سر المادرة بدرو ولا مجر مرا ا در باخت برصای نیاز بر نے بلایا می دونوں شرکی کر مرحد شرک مرد اور مرح مرد مرکز می مردون مرکزی فاحدى من المادى و لمرض من حرار مص احد الم دون الم منافق احر في المالي في be مونى من جملازان مرين بر منده من مريد من مريد مريد مريد مريد مريد مريد مريد ار این مرا الا من على عن الى جرب عد ولا تنها ازان عسرت ، مراس سے عد مرد سرط » » مراس -6-الموالة مي الكر عدة في من المب من من مرد بل مرد من من مر من مر من مر من مر من من مراج مر الدمير العدط 2 جا عد ولا من ازان عدم المرم مرمن من من مرفز من مرد من مرد من مرد من مرد من مرد من مرد من موال اور الله دوال ميران مرد من مرد من مرد من مرد من من مال دو من من مرد من مرد من مرد من مرد من مرد من مرد من

1 prosent and the particular and the states Chine and a show and a for the and the state of the state app participant and proper and the to the the مرد بو هر المراجع مد بوعل و الله توانی کاری بو المرد الم است علومان من المراده الا جنوبين المرد ا المراجع علومان من المراده الا جنوبين المرد الم en the fille of the set of the set of the set of the set with the second and the presence of the second second المدر مدير مرد المحالية المري والمحالية المري المري المريد المريد المركة وعرائم and the south of the state of the Differ Differ The Top of the in the first state of the state of the first the second of the معقول معرون المسلم على ترقع في الحراف المحالي في والمع الموالي الم بر متدمر می انجران فرق مربس مربط مرجم محمد المرب فی انجران الله المرب برای انتخاب المران می مربط مربط مربط مربط المربط الله الله الم باجوادين



 $\langle \cdot \rangle$ (.37)1% - 00:05 con 21/7 in consel - 01:40 cis 21/11 -14, Co 3, C مان ودر شمر سوتل مروزا جانب شرق الم مار وب بالم موسر را مالد محصر المراج مراجر كمرية المسروز من خاص عام من المن المنافع الموم 192 ، أحرف المولد 172 . كرانور عار المام . 18 م المراب موتان مراب مراب مراب المان ماد المال بلك مراب اجت مدرع المع موقد بالدينا مدوران حلف موال مدمر بالد - عرف مر 2 - شور ام فارور المروع مرور مردس وت ورف اوجوان المرار ع درور مع مواند جا رد الوكر بي الله من بيد المراب الزي اوراب الركا مم بيه مالت من الله الم ع جد در الد مرد بد ور ما من مر مر حالت من لين مون من اور دونول مدول ع درمان رام سا مذ ب مردد الم حرب المرد واقل وروان الم مرد ما الله مر س الل جرس سرى مونى من درمات مر دروان معدك والي ترج عاديا ام مده المردد ما دار در معد مدن دس الله شعرة كله سلم سرائي الري = اجامام مست مان وف وان وتر وما ران ب دسید مند ما اسی عرض مند مرابع از من ما در ایم اجر در را ط اهم مور را ط اهم مور ما ط مرد مرابع العر موم مد م اسی مدین اسی ساعة لینی لوی عداد بالام مساح شاد سر دخش منول جارجر خدم رسی س سرا سا مذه ستدمر الم لد مور شق در بافت مرم ما ، شا در به ما مر معم دولول لر مول م جردرائي ماد / محادي من جادي مطاحدي مر الدفاري في والد المري درار في س ا مدم ودول اس ما تا اجرت سر سرا، كاري كروني في حو عما مدر ما مدس المدين المري ودول سفده ال م حرق کر طف ساجا مر مدرک کردی مدل جرد الراب من ما مرد الراب من ما مدین بال من مدن جوجا مر مدین وزین سب مسرس سے مدکور ما جرمد، ساہ برصور از ایت عدد تو بہا موالی، اسی طرح ما ہ شارس من عدد اور بخرط منسر مرا بل عد مرامد سوا استمر ط در تدس ازان مد الم سے سرس سے متم مال برہ دور ہے ، ایک ورد تجرمر ماتل جون اور ماصل ایک در با میں سے ایک در تجرمر باز یون سرس سے مقم سلو ابرہ دیئر یہ سرک مدین شروعہ مرس کا سرموضو سررلیز و قریبا کا منا وزن برے میں میں میں بإجامد ومن 194 مرا كالمرار في ورجرى مرم حرور لوكى متار مع وعن مول مر مر در المراجر مار شرب عل مرا سل مر فار و و و و مراجع مر و ما مار و مراجع مرا مرا سر ا مالی مراجع علی مراجع م مراجع می وجود مراجع م ا_{دم}2 - ر بسب حمام در بودیت تشرفها را) مراحد می از را . ی طاهه رویسیا - ا ى تى تەركى كى تەركى كى كى كى كى كى كى كە

مرس ، مرقم ، بو با بر اور ، بار مسلم مسلم على مسلم مرد مرد مرد من مرك عرم رمل مان مرتب جرم مارد ما ارتباط مرتباط رفعار م مركد مراح الماج معر مست لف ل عوم جود ارسان الم عرد و الأربال مراح المار مد المار المار الماري المحرد و الأبل م المتداخر وغسور مرغ والحقوري مرضات لمدى ن ل مفرد العاق دون رم عراق در ل المر ودج طالف منا الخر مدال علمان مدله مار من ك درج مرغ معمد درجر در م نق مرج مراغات موار ماتان منا و مارج (Hn & Bagnotar 21. 11. 2018

<u>[</u>] 371-A-B71-B Un 2: 1/12/1 9.BCV874-ار لور مشما على حصيرووم (اندرون) بالان الما مري مفر ترتير فوم اعوان سائن ما مد فعن سلاف مدار ور فوس اللون ما مع من المرسان في مرجل الوعم مجاول المربي الم تحمل المرالا تحمل محتون ما تعديما سرائ المرا ما ما مرا ما المرائل ما المرال مرالي Eng Sin جون مرم المرحد في ووفون عرا و من المر، المرالي ساندان مري فساك احدث معلى 8 معية ارزوج من عجر قرم اللوشرا من الدر فرمل من الم الموسى مرواى المدجوى من يك ترفيا رج . من المر ، المرب الم July C الله مع منه المستواب وجوان وج في في جواني في في المسل من المع المسل في المسل في المسل في المسل في المسل في المسل Stude (Mon 20000 gler & JR ع بان ماه مازی دعد سول باج فر مرجن سان طرا سام و بزرو ل المرجد مع المادين في معان محالي معان معان معان معان معال معال معال معالى معالى معالى معالى معالى معالى معالى معالى مسرت ساقع خرم محبوران، مربق من مخالف جلم جرادر محلف وقرن تے ساتھ رصابی کے اور کی طور کے ایک ساتھ رابد قاری جرابی جن مردام المرحة داري والحران عراف، مرك المرا المرا المرا في منا في المرا المر سائع « معید ار روپ میں منصح جوش تکنونسر ۲ میں اور مورش میں زما بر ماری تروای اور برس سے ی تر فعار یہ نے میں الا ہو، الاسر نے اپنے سال کے ا المان ناصر علا شعن تحان تكو شرف ورواجت ماري ما من اور لعد 728 ، در ر Jun فقرى خوارى سے عمران عام معاص مسلم منته من ولي تر مح ور لي رو مر الل م تحراع بإسرد یشم ریخ. ب جوس تكنوش كمرين و ولون بيرون في درسان رومي سالير في مرل تر دو بوش مرا مد مری اس طن بذر لور لارا) بل ط مرت اذان مرا ت چرس س مذري مح Nic مسلح الموضي ابن عدد و ابل دو تين ، امه اطح مسان مذاريم منه است عبر دا ورج جا من موجع في في ميرت من من ما ما ميلي أ دان من المر ساند عدد اللي والى فون ، يرس سى وقام مدان محمد مدين محمد المراطي من المريط معامل فون چراس سى رقىم مرابع اروي در اسر المرب مرا مروح در ا مرابع المراج من معلى عن من تر المراج من من عن عدم مرابع المرابع ا مرامی محتر به اور ماجی عارمه محرمی ترا به جرام عا خدر بی من اجراب خدر اس مرد بر اس مرابع محتر به اور ماجی عارمه محرمی ترا به جراب عالی در بالی من تر ب محالات محق فر معان ترمزار می سرمی بر تر ایک می می محراب معالی تر خداری منبر 3 ، با

in But and a stand the second for the second of the وست في على المراح المراح المراد م المورد م الموت مرد في ور مرجع خراری می ورد - ورد - ورد مراب قیا - ورد جریم ا ادر لویم 22 مع دروارش ما میرا میں مان م متر الفترى لا المحرمي ترجم و و المك معامل معدي عمر في عمر في الم وتر يتح - دوران فينا عج بولى تركم في مروس دون مرون تے ورسان رقب سا مرد بیر کی خرد موس غراب دری ادر دو بوش عمر ای مرتب ، اس سالی سی سی ایس جری مرا سر برای اس طل مر ر اس این الم ما المرديش سات مرت تح ورس من المردي مح ما الا ، سام (100 مرد ب اس مرد مو بن مرائل سماه شاری سه ایک در اطل کار می ون دون مراد است المرجى على المرسى ومن مرد يا مرك مرد من مرد من مرد من من وران من روب الله دردارومی المررارون سی التی سرد بط مور بل فرن مرس سی مرف چرمی زمانی طبق میں سے محد 2 تحرار محرمی مل خ رویل منہ لے جاتے کر دیں الی مار م د بن مراح ما محروس مربر 2 استنظی حسر مع خوش عراب کے دیکس فتوں مربع خوش مراب کے دیکس فتوں برای اس فی داد سای دور بر اس از بارس بن د ، با دران در در میں یا می ما مدہ دو بوتی غراب ما معہ نے ورش ورش ما یہ بی نے سل بنہ ک مطوروم على ترا الأصاص ف مروف فر و مين ورس من فرد مريج مرتب والمحمد و اور المعربة المربعة المحرور و المع المحرور من م تحراد في مادن رود و 237 منعن خان بلونسر ف مرد وت مادي ما ما اسرور من بارا ور الفراي الدس تراه ما الم مامن سلم مسلم مسلم مسلم مسلم مراج وقتل تح تمرة من معان فالمردة دخل عان الإرام معان الرور معين م م دفتر ماج سامن ميم مع ما وروا الحاراليرما المرول الاور ال ارم ای ای ای از ای بواند و دار و مراحات فرد ای مراب بر و فرد فسين خريبي ي مدريان مادر خو شرقها ر الم تمان عول ما حواج مع ا حيار بع مررا بري بن ن به . ورن س بار مان فو بر 772 مندن مان ترز من مرار ارت مرار ارت مان آمان اعروز من مردر الدولي in the show when the is the internet the offer

يوليس فارم ۲۵_۵۴ (۱). ر ابور ط صمنی حصه دوم (اندرونی) ف حرب مرب مرو مرو میں فرمی ی مدرمان مدر فر مرار زیم ل 2 was 2/3- el 5 - w cont w w al o - 4 - 9 - 9 - 9 - 9 - 9 تا الم المراحة Asi معنى ولى من مراجة مراجة مراجة المرور الح ازه صاحر 2 يرد مرور از ان ما و منا ري ور مرد كر ان دار ما مر All مما ملاقع الميدان في موال على 205 في المرادي كلي - 25 في 205 من 200 - 25 في 200 من 2000 من 200 م مراب کی میلی تیا زیم کی برای میل بیم 7 بیم از می خرون فرد فریس در این میں فرد کا یا میں مرتب کیا فرد چرمی ا دستر ای کی ای بودانیں ب على المج ع ون المج ع ون المسلف وعان مل تري سر مان ون الم المرور من الم ان مراحد کر 2 مرد کر مراب ادان میان مرک در 2 رو ا من جو در المحالي المحمد الحاق 205 من لورو مر مر مراد الر خدى تى والاردى جراب زارة طامن ب 2 عدر برب مدان ما قىر مع يكى غريب مركم مسى 2 مرديون مولى اذان مى 6 مدار بر ما ديل بارس مرد ما مراج مرد المرد مي مرد مي مرد ما م مرد ما م مي محل فروجر سرا وتخط ش ما. جرر ش م

n de la come La come de la (61.) مسى عادل دلى منادر الله - توم كو ستانى ساكن حال سليم ت برول دو يا فت سان بالد س كبرى وبرك ولركر يرب اوركيرى وب موادات ع حكو ما يطر في ولال بو ور م الم الم كو يح جر الم جانة والات بزراد فون بتاياته بم قد درس بارد دين من اور الله جرافياً من روما اللام آبر وحيرة مرولون 2 لا جانا الخ بالكرة بارع بادع با ثرا جا بن حد من الما باكم من جدي ماع داير اجراددان که ای مع در در سان حرور دهی او چ بلک بر نظامی ی دان ح لَدَ راحت من كي شب ير صلوم براكم يم جارون هي بلين امك دور بل تُرفيغ نعل بين جب ب ملفوتر ما ي منفي تو وزيوران : ع بتايا كم جونك سفر كا نعلا میں ہم لوک ہو کے 2 کرہ میں بیٹ ہو۔ قر کہ 100 مامیے تعام بلغ تر 201 كر حلك كر تى المراكة الن من قبل تعان كا وفي المعاد مولى المعاد مولى الم با عليه مامد بس وی ا 12 مح وی جن عمالا اور مر محصون جر ارادون مر مَوْنَ FIR كرن كابا ف كى جو لمرس يما جلاكم مردوا فر الحرب علاون ور الحرب الا معدم و مر ا عرب بل ما تو جور 1000 رو مر وران ار س) 2 لي . سر حافی کو رولن لغشین ملکم جین آجے عالیٰ کر جرم بال حرا و الحر و مر د کون کا اور ان سے 5000 ا دوب لی اور پے حرف الله کا فقدم میں . در م رطان ع جو کم درمت بع De

÷. 62 میکن از ان محمد فد نیر دلد عجر الت میر توم مزلل سالیه کاله بلونون ن برولان دویا من برای برای مراجع مراجع از مراجع مرال في من موجود وعالمد دات لغربة ما 2008 , 518 . مر ابع كور چان میں اس ارد میں ان علم میں " موجل ت تردن میں درارا وج بر مربع مرس ، من ، حرس تغل بر خاس عرب من ما مه دهود مال تو دا بولی فر آنا دور ۲۶ من مال ۲۰ دار و قلک میں تو ک ن جرنی ساعر دین من میں ای اور دان عد مرد اور 2 دران CoFIR Uniter of the set of the view of the sal of the s M. adaed . محمد فترير دلع عجر مشير توم ودول سامنه مي له يلويز 0344.9502936 \$3tol -8 131018-558570-5

(53) بيك مازن المررا من ولردا من المد في من المد ن برون الو المرى با نا برا ممان تازم عامرى دو في برا محين يلين رعبر تحويظ كا حروم بالم الوصاة تازم بالم مرى الما دوست لا موى د ب والى بع مالم مرت با ال جی تحویظ ملع کار جا میں تک میں کے اپنے دور سے انگر ولد انجاز اعمد ردین روید سے تیک مرسری در سف شازیر سیا هذا کی سمبلی لاہر سے تی تیری بے تصویر کا برتمر ام بے ڈی جما میل کے دو جانے بول کاری مرا- بر لوگ کی بلین سے در من میں میں مر شاکر ما آجا دوز ہمال برز آن منها ملى . مرك . الراج المراب المربع الما فقا - ماد راسة من برك ور ماركا ما تسبره بازار من الكريت بيل جربات بين ها دى نديل د س ، المراجة من مرى مرى مريد الي درس عادل و بدرال كى فن مورن مارس بلایا اور اسط مرک می جان انتہا می مون مرغ کور ايد ريسين مروم م تحفظ و- جمائي جريم تلقي تراب تتم يول س آدا) , بيوا) س در تمان ولي مركل س برا در در مرا صف مفادة تمنية تر آي اور بيس أنثار ترك مرك دوست الكس عدر سے مشہر بھی بامر ہر یہ ایج میں وہ ہوتی لے آئے میں ان ہر میل اور میر م د جستر معرفر بیس بین عدیت تر مانل بیل ساحر $\frac{2}{9}/\frac{9}{5} = \frac{1}{5} = \frac{1}{5$

Ahmed الممرديل من دار وط من المرثوم قفل المنه لي 311-5627586

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(64)سی اید عن ول ظهرورا (کمن قوم مرال) نوال نور و جنور ا ن بروان درماین برای ما م س شمع مو کی میں بلود و میر ملازمت قرعا مون موري من 800 في 2 جون العبريوت اور در کا م مر کل می فی محد عر عرب با او شام م مار باس عمان کاربناس به مودی در آرام سازی بَنَ لُعْتَر بِنَا مَ يَدْ كَعُنُونَ لِعِد عَامَى لِولِسَى حَفَّم جَلَاكَ عَلَد تكوند مركل س داخل موع اور كمرون كا عملت متردع بردى ارد دولن عملی فی مردن سے شریرہ مان قر مرد، وزن تو رہن مرکم تھانہ 2 سے فر لور ہی ہے جو ے مزودان مولی محان من فقر مرد جمستر بوا - مر جمن بانا با قرم درست ب me AA. جرائز ميم ولم طميود الركان قر) مزول الا مرجر جنده جر 0347.9754870 13/01-2949912-1

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بمنع (65 المرام 2 كاروش من تولى وخاك مس تو الرال عام: بنوارس لغنا في من - مرى ليسال عدمان \in من معهدا في من الفار مرز أخض عراص عرارات العاريس للأرباح الله التركيا في منهاد يص إسى بار من بار من من من جوار خارج بن لا بال جى ملي حمر المرسى ميں مروشا فاوقا منسكا - فررش كار معلى الح 12 رتی ی اور دو ان بال تو کس میں کیا۔ جرمیا تحداثی اس میں ترفى شعلى م تعا . من زیر ان با جماع میں رکبی تھی ۔ من شکل کی کسا کسی میں جب کی کھ کھی کو نیا جب رک ہ ادبر ' XX رتی کی الزامام بے بن دی ۔ You have an in a ser is when it was (1) 5) 10-18 - 23 4 5 3 m center 710-1040 (= محرر جرائا س تهای س رود ای وط م المح ک از این ما ب من ويم م تعام وه محله جريم ك من س ما ب اور ب س مر با م مو فور تمعار Mile Julie (Miles all ecority 1

60 معدمن تورث بون المريش ورمر 1446 قطام مر المن مطور دارد دوني را ها . هسب رم س) فرانج دا بور ر دن تر با جاناً اور لمن و توديد ما مل الما ي الا - بروز وقوم دا شربین برخا ووی م وقت محما میں دیا جا میں میں محکا کدر کوی کے سر کا مطار ووی کے وقت محمان میں میں کی دوی محالی میں نے مراسل دیان ، دورا کا کدر ما سل تر وقدم درزج در في من دمن مد كا من · K Úlu. ن ج دهارون مردون تسور Alicsie Hite P3 - 49mbd 10- 2- 2019

N while in the interes 1446 (67) and (11) is and in the second of the seco بہانی حوظہ میں نے جو بیان دران أندار کی جناب ابد سن مح جامع تو دیا ہے تو ہی میں میں بال تھور کیا جاتے ہوں ملیل ذرست اور حصیت بر سی ب 1446 reline (find مال بولس التي المين الم موزم - 19- 2- 2- 7-×× سس الات بالای مسل می می از بار می اسل می الار س آرمن این می این میں ان می ج: ملزمان ب ملاق العون ف اللو رضم عميام) أب مساب للمرز ف ادرأس من عن محمد مسرر اب راس المرتب -من لا خان العرفرات حوف و مربع مر باد مرا) مقام محرف سانعل الروسی فرنی براز با از مراح -ج: موق مولام موز سالیس مقات می از می موز سالیس موز سالیس محق لي في الم من الم الم الم سور آب سی طرح می معرف کر طوش میر ان وال بولیس دولتوں میر ا ج: حمول الدياميم ف ساتا محما مدت مول في اس مي على مدر مين ادرب

(68) -:136010 . عواله مستهم جاج تنبيت وي سالزي المش ليرغيري 44/26 جار قعت مونة ساك فكم لالي من من من من الل ع الزمن كرد بالع ال الماسال مع دُعام مجمع من تعينات اور تقريمًا @ الأسرا في ماخلان دُخام ع ابن و مول اسما قدام میں براغام در چکا مورا ، سال و مدن تعینات میں بن خبر م براج ملك مرايين المانياري عساق ابن و اف را فاكر دي مالقرعا) والمرا ماحیان نقام نا سائل کا ڈیجن جوں دیجی اور بامان المعد کا یعین دیا تی تو یف ی ج ; isher اب چیک سائل کو فندکر بالا چارج شین مل سے جس کے سالق سائل منشیات خروشوں اور تمر سطر نے ساتھ دان دلفتا ہے جبکہ برالنا) حققت کے بائیل بر قلس بھ (مرد) کے ترون نے طور بر من - ان کا بر لون جریں دور ہے جو میں دیتے گئے ہوں - ان کا بر جری کا جرار کر جری کا جرار ان کا ج السوار من ما روان الرسائل ونتيات فروشون كرسا قر ماي دخورا لا مي ا - illevis مرم ایک ال کا تعیناتی میں سائل نے داخت جاج اور نمایت ایا از اور ان ایک ایک کا تعاق ایک کا مراغام دی سائل کار اس تعینانی کے حدول سائل کا کی حرمان برای نی ای ا الكرساني في حرياتي بر في يوان كا بمانين هم تعرسا تي كو حريا تل كما بعراليس كا كما يرا ال المرسائل كر خرد حوط على 21 يوزليش ما يتم نين بونط فقا توسائل كما خير مالون كمام كر 2 و1 كون Fracalitate درنا ... النزم الجاسان = بد بناد م سال ماغير سطير عسانة بي كوني تعلق م ج - ارد م ي دود العينالي اس من مرد د عند والروائي سائد الفعل بيد عنا دخل في - سائل تعان مانو من تعينات محا ومر دود ع تو چوک برافر اور خارد در ار ار مرد س مدمر کی گرز جاتی تعی -: Un 100 سال حلفاً بالى هيل كمر، جماعير قالون كام كم واح 2 سادة سائل مارين جمالي من واح 5 حطاطه كام باري الفي مع المواشري كران حاكم سائل كوالعاف دين مم وزارج مالاج بنيادار مات مع مرك النرم قرار ديا حك $\underbrace{\mathcal{O}}_{\mathcal{O}} = \underbrace{\mathcal{O}}_{\mathcal{O}} \underbrace{\mathcal{O}} \underbrace{\mathcal{O}} \underbrace{\mathcal{O}}_{\mathcal{O}} \underbrace{\mathcalO}_{\mathcalO} \underbrace{\mathcalO}_{\mathcalO} \underbrace{\mathcalO}_{\mathcalO} \underbrace{\mathcalO}} \underbrace{\mathcalO}_{\mathcalO} \underbrace{\mathcalO}_{\mathcalO} \underbrace{\mathcalO}_{\mathcalO} \underbrace{\mathcalO} \underbrace{\mathcalO}_{\mathcalO} \underbrace{\mathcalO} \underbrace{\mathcalO} \underbrace{\mathcalO}_{\mathcalO} \underbrace{\mathcalO} \underbrace{\mathcalO$ Alleste HU" N- 1004 19. 507.02.19.