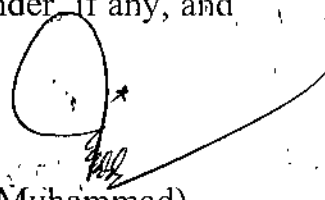


14.11.2022

Clerk of learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Arif Saleem, Stenographer for the respondents present and submitted reply/comments which are placed on file. Copy of the same handed over to clerk of learned counsel. To come up for rejoinder, if any, and arguments before the D.B on 14.12.2022.


SCANNED  
KPST  
Peshawar

  
(Mian Muhammad)  
Member (E)

14<sup>th</sup> Dec. 2022

Due to strike of the Bar and Mrs. Rozina Rehman, learned Member (J) being on leave, this matter is adjourned to 06.03.2023 before the D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.

SCANNED  
KPST  
Peshawar

  
(Fareeha Paul)  
Member(E)

06 September, 2022

Counsel for the appellant present.

Learned counsel for the appellant stated that security and process fee have not been deposited within due time and requested for extension of time to deposit the same. Request is accepted. Appellant is directed to deposit security and process fee within 03 working days. Thereafter, out district respondents be summoned through TCS, the expenses of which be deposited by the appellant within 03 days while the local respondents be summoned through process serving agency of the learned Senior Civil Judge, Peshawar. To come up for written reply/comments on 18.10.2022 before S.B.



(Kalim Arshad Khan)  
Chairman

18.10.2022

Junior to counsel for appellant present.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Reply not submitted. Learned AAG requested for time to submit reply; granted. To come up for reply/comments on 14.11.2022 before S.B.



(Rozina Rehman)  
Member (J)

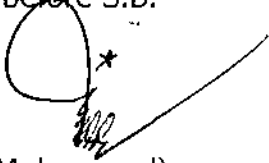
Rs 100

Appellant Directed  
Security & Process Fee

6/9/22

20.05.2022


Junior to counsel for the appellant present and requested for adjournment as senior counsel for the appellant is not available today. Adjourned. To come up for preliminary hearing on 04.07.2022 before S.B.

  
(Mian Muhammad)  
Member (E)

4<sup>th</sup> July, 2022

Appellant alongwith his counsel present.

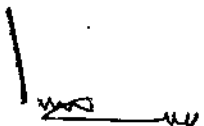

Learned counsel for the appellant submits that against the impugned order dated 30.08.2021 whereby the appellant was awarded minor punishment of stoppage of three increments without accumulative effect and intervening period was treated as unauthorized leave without pay, he filed departmental appeal on 26.09.2021 which was rejected on 01.12.2021, within next thirty days he filed this appeal which is within time. This appeal is thus admitted to full hearing subject to all just and legal objections by the other side. Out district respondents be summoned through TCS, the expenses of which be deposited by the appellant within three days, while the local respondents be summoned through process serving agency of the learned Senior Civil Judge, Peshawar. To come up for written reply/comments on 06.09.2022 before S.B.

  
(Kalim Arshad Khan)  
Chairman

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 205/2022 \_\_\_\_\_


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/02/2022	<p>The appeal of Mr. Ayatullah resubmitted today by Mr. Ashraf Ali Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be out there on <u>6-04-2022</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p><i>03</i> <i>06/4/22</i> None present. Notices to the appellant/Counsel for 20-05-2022</p> <p><i>Noted by Ashraf Ali Adv Counsel for Appellant</i></p> <p><i>21/5/22</i></p>

The appeal of Mr. Ayat Ullah, SHO, Police Station, Cantt: District Kohat received today i.e. on 31.12.2021 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

1. Index of the appeal is not attached with the appeal.
2. Appeal has not been flagged/marked with annexure marks.
3. Annexures of the appeal may be attested.
4. Affidavit attached with the appeal is not attested by the Oath Commissioner.
5. Certificate be given to the effect that appellants has not been filed any service appeal earlier on the subject matter before this Tribunal.
6. Departmental appeals and orders mentioned in the heading of the appeal is not attached with the appeal, may also be submitted with the appeal.
7. Annexures mentioned in the memo of the appeal is not attached with the appeal.
8. Four more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

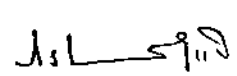
No. 01 /S.T,

Dt. 03/01/2021

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.


Mr. Ashraf Ali Khattak Adv. Pesh.

Copy of order dated 31-8-2021, departmental appeal are still not available. kindly grant additional day for submission of the same.

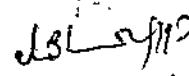


Ashraf Ali Khattak  
Advocate  
21-1-2022


⑩ days time further extended.

  
21/01/2022.

Kindly grant additional time for submission of requisite documents.

  
Ashraf Ali Khattak  
Advocate 10-02-2022

10 days time further extended.

  
10/2/22

Six,

Re-submitted After removal  
objection. Please fixed before  
the bench.

1st 5/11/0  
18/2/22

**BEFOR THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

SERVICE APPEAL No. 205 /2021

Ayat Ullah,  
SHO.

Police Station. Cantt:

Kohat..... Appellant-

Versus

The Regional Police Officer,

Kohat Region Kohat and others..... Respondents-

**INDEX**

S.No.	Description of Documents	Date	Annexure	Pages
1.	Memo of Service Appeal with affidavit			1- 11
2.	Copy of FIR No.1593, Statement u/s 164 CrPC and order of Discharge of Judicial Magistrate-II, Kohat.		A	12- 16
3.	Copy of report of Superintendent Investigation, Kohat.		B	17- 18
4.	Copy of charge sheet and statement of allegation		C	19- 20
5.	Copy of reply to charge sheet		D	21-
6.	Copy of inquiry report alongwith statements		E	22- 30
7.	Copy of order dated 16-01-2020, departmental appeal and rejection order dated 06-07-2020		F	31- 34
8.	Copy of service Appeal No.3325 of 2020 along with reply and decision of this Hon'ble Tribunal.		G	35- 50
9.	Copy of final show cause notice and reply		H	51- 57
10.	Copy of impugned order dated 31-08-2021		I	58- 59
11.	Copy of departmental		J	60- 65

S.No.	Description of Documents	Date	Annexure	Pages
	appeal			
12.	Copy of impugned order	01-12-2021	K	66
13.	Copy of report and report of indentification parade along with order of Judicial Magistrate, Kohat dated 10-10-2020		L	67-69
14.	Wakalat Nama.			70

*Ayatullah*  
Appellant

Through

*ASL 5/110*  
Ashraf Ali Khattak  
Advocate,  
Supreme Court of Pakistan

Dated \_\_\_ / \_\_\_ /2021



1

**BEFOR THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**SERVICE APPEAL No 205 /2022**

Khyber Pakhtunkhwa  
Service Tribunal Act

Case No. 8128

Dated 31/12/2021

Ayat Ullah,  
SHO,  
Police Station, Cantt:  
Kohat.....

Appellant-

**Versus**

1. **The Regional Police Officer,  
Kohat Region Kohat.**

2. **The District Police Officer,  
Kohat.....**

Respondents-

Service Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 read with Police Rules, 1975 and Rule-19 of Govt: Servant (Efficiency & Discipline) Rule, 2011 against the impugned Final order of the respondent No.1 End: No.19063/EC, dated Kohat the 01-12-2021, wherein he rejected the departmental appeal of the appellant preferred against the order passed by respondent No.2 vide OB No.590 dated 30-08-2021, whereby he awarded punishment of stoppage of 03 increments without accumulative effect and intervening period was treated as unauthorized leave without pay.

1000-1000  
31/12/2021  
Registrar

**Prayer in Appeal:-**

**On acceptance of the instant service appeal, this Hon'ble Tribunal may graciously be pleased to:-**

1. **Declare the impugned order of the respondent No.1 End: No.19063/EC, dated Kohat the 01-12-2021 and impugned**

order of respondent No.2 vide OB No.1373 dated 14-12-2018  
as illegal, unlawful and without lawful authority;

2. Set aside both the impugned orders and re-instate the appellant with all back benefits including the counting of intervening period as period on active duty.
3. Any other relief deemed appropriate in the circumstances of the case not specifically asked for may also be graciously granted.

Respectfully Sheweth,

The concise facts giving rise to the present Service Appeal are as under:-

1. That appellant is the employee of police force, Kohat and presently serving as SHO Police Station City Cantt: He has long service standing at his credit.
2. That appellant was proceeded against departmentally for certain false allegations.

#### Brief History

3. That one Mst: Fatima Gul W/O Israr Khan R/o Mohallah Main Badshah, Kohat City on 03-12-2019 reported the local Police that about 16:30 hrs, she was present at her house; that in meanwhile the door of her house was knocked. Upon which she opened the door and found a person in police uniform. She informed her son namely Muhammad Ali, who came out and was then driven away by the person wearing police uniform in a vitz motor car. In the meantime Israr Khan husband of the complainant unfolded that he has got dispute over landed property with one Fahad s/o Nasrullah r/o of Garhi Dodediwal who was not paying Rs.95 lac as sale consideration of the land and threatened for abutment of relationship. He suspected that his son was taken away by him in Police uniform. The report was entered in daily diary No36 dated 3-12-2019 and investigation under section 156(iii) CrPC was initiated. At the time of lodging report victim Muhammad Ali also appeared and stated that two persons in police uniform and two others in civil dress have taken him away in a white motor car. The victim was examined under section 161 and 164 Cr P C. The investigation was carried out which culminated into lodging of FIR

No.1593 dated 5-12-2019 under section 365 PPC PS city against Farhad s/o Nasrullah and later on, Zubair s/o Muhammad Riaz and Muhammad Qadafi S/o Muhammad Shafique.

4. That as per report of superintendent of police investigation wing Kohat the cell number of the appellant and his gunners namely constable Abdul Wahab and Muhammad Abid had appeared in CDR allegedly of having telephonic contact with suspect accused Farhad before and after the commission of offence (**Annexure-B**).
5. That in the light of Report of Superintendent Investigation, Kohat; appellant and his gunners were charge sheeted with having role in the kidnapping of the son (namely Muhammad Ali) of complainant Mst: Fatima Gul.
6. That appellant was served with charge sheet and statement of allegation (**Annexure-C**) to which he submitted reply and denied the alleged involvement (**Annexure-D**).
7. That inquiry was conducted through SP Operation Kohat (Inquiry Officer), who conducted inquiry (**Annexure-E**).
8. That the respondent No.2 (DPO, Kohat) vide order dated 16-01-2020 (**Annexure-F**) dismissed the appellant from his legal service without serving him with final show cause and providing him opportunity of personal hearing.
9. That the appeal was disposed of vide order dated 27-07-2021 in the following words:- (**Annexure-G**)  
**“Keeping in view the above discussion, this appeal is partially accepted and case is remitted to the department with direction to receive reply of the appellant to the final show cause notice within 07 days of the receipt of this judgment and than to pass a speaking order according to law.”**
10. That in pursuance of the above direction of this Hon'ble Tribunal; appellant was re-instated and a fresh process was initiated and appellant was required to submit reply to the final show cause, which he submitted according (**Annexure-H**).
11. That vide impugned order Endst:4933-35/PA dated Kohat the 31-08-2021 (**Annexure-I**); the worthy DPO (respondent No.2) imposed upon the appellant minor punishment of stoppage of 03 increments without cumulative effect and the intervening period was treated as unauthorized leave without pay and re-instate the appellant on his substantial post of SI.

12. That appellant being aggrieved of the impugned order of respondent No.2 dated 31-08-2021 preferred departmental appeal before respondent No.1 (**Annexure-J**), who vide impugned final order dated 01-12-2021 (**Annexure-K**) rejected the same without any legal and justifiable reason.

Hence the present service appeal inter alias on the following **grounds:**

A. That appellant has not been treated by the respondents in accordance with law, rules and policy governing the subject and acted in violation of Article, 3, 4 and 10A of the Constitution of Pakistan, 1973. Appellant was neither charged by the complainant (Mst: Fatima Gul) and not even by the alleged abductee (Muhammad Ali) nor has I.O of the criminal case procured any evidence which can connect the appellant with alleged accusations provided in the charge sheet and statement of allegations. Since there was no evidence against the appellant therefore, he was not made an accused person in criminal case. In circumstance the penal impugned order is not tenable in the eyes of law and liable to set aside.

B. That appellant was charged as to the following effects:-

**Allegations:**

- a. **On 30-12-2019, complainant of case FIR No.1593 dated 05-12-2019 under section 365 PPC PS City, reported regarding taking of her/his son by persons in police uniform.**
- b. **As contemplated from report of SP Investigation Kohat, your gunners named Constable Abdul Wahab and Muhammad Abid had telephonically contacted with charged accused before and after occurrence.**
- c. **It was also reported that you have also contact with the accused on the eventful day i.e before and after the occurrence.**

Now discussing the accusations/allegations one by one; appellant humbly submit as to the following:-

**Allegation No. "a":**

- a. **"On 30-12-2019, complainant of case FIR No.1593 dated 05-12-2019 under section 365 PPC PS City, reported regarding taking of her/his son by persons in police uniform".**

In this respect, it is humbly submitted;

- i. That it is correct that complaint namely Fatima Gul lodged a complaint on 30-12-2019 at PS Saddar, which resulted into

lodging of FIR No.1593 dated 05-12-2019 under section 365 PPC, but the complainant neither nominated the appellant nor his gunners. Detail investigation along with identification parade was carried out and even appellant and his gunner/driver were produced before the complainant and her son (alleged victim), but they categorically declared that they are not the person, who were in police uniform at the time of abduction proceedings of the alleged victim. Identification of Vtz car was also carried out. Complainant and her so called abducted son were seated in the Vtz car and were driven through different routs as per demand of complainant and her son. Both of them categorically declared that this was not the car, which was used in the abduction. Case diary dated 28-01-2020 and identification parade dated 17-12-2019 are worth perusal (**Annexure-L**). Prosecution failed to bring an iota of evidence against the appellant. Appellant's name and the names of his gunner are missing in the column of accused.

13. It is evident from the contents of the FIR that complainant had narrated only apprehension against the nominated accused "Farhad". It is evident from the order dated 10-10-2020 of the Hon'ble Judicial Magistrate-II, Kohat that the nominated accused "Farhad and others" were discharge under section 63 read with section 169 Cr.P.C. Section 169 provide that accused be released from criminal liability, when prosecution has no evidence. Since the prosecution had no evidence against the nominated accused Farhad s/o Nasrullah, Zubair s/o Muhammad Riaz and Muhammad Qadafi S/o Muhammad Shafique, therefore the Court was bound to release and discharge the accused and it did so even in the absence of accused as evident from the order of court dated 10-10-2019 ( **Annexure-L**).

If prosecution has no evidence against the nominated accused than how and under what authority of law; appellant could be presumed as guilty and penalized departmentally; when his name was nowhere in the penal of accused?

**Allegation No. "b" and "c":**

- b. As contemplated from report of SP Investigation Kohat, your gunners named Constable Abdul Wahab and Muhammad Abid had telephonically contacted with charged accused before and after occurrence.**
- c. It was also reported that you have also contact with the accused on the eventful day i.e before and after the occurrence.**

In this respect, it is humbly submitted that a detail inquiry was conducted to probe into the alleged allegations, but nothing was bring on record which could connect the appellant with leveled charges.

It is worth mentioning that appellant was charge sheeted on account of report submitted by SP Investigation, Kohat; wherein he charged the appellant for having cell contact with the nominated accused "Farhad" on the day of alleged occurrence of case FIR No.1593 cited ibid. Nothing more nothing less.

During inquiry proceedings the inquiry officer recorded the statement of (1) Anwar Shah OII (IO of the Criminal Case), (2) Israr Khan S/o Nisar Khan (Husband of the complainant "Fatima Gul Bibi"), (3) Mst: Fatima Gul w/o Israr Khan (Complainant of Criminal case), (4) Muhammad Ali S/o Israr Khan (alleged abductees and son of complainant) and (5) Farhad (alleged nominated accused of the criminal case).

Inquiry Officer failed to bring an iota of incriminating evidence against the undersigned. The statement of witnesses is worth perusal.

Anwar Shah (IO) in his statement has categorically denied the appellant involvement in the occurrence. He has stated in his examination in chief that identification parade of Vitz Car under the control of Ayat Ullah SHO was carried out, but complainant and her son (alleged abductees) categorically declare that it was not the car, which was used in the abduction. Moreover, appellant and his gunners were also brought before the complainant and her son, but both of them declared that appellant and others are not the persons who participated in the alleged abduction.

The IO of the Criminal Case (Anwar Shah) was cross examined by the Inquiry Officer but nothing incriminating material was procured. He was put to a question as to whether Constable Abdul Wahab, Muhammad Abid and SHO Ayat Ullah (appellant) are accused of the offence of FIR No.1593 dated 05-12-2019? The answer was negative. He categorically stated that as per his investigation SHO Ayat Ullah (appellant) and his gunners are not accused and moreover Vitz Car under the supervision of SHO Ayat Ullah (appellant) was also not identified by the complainant and her son. The relevant portion of the statement is reproduced as under:-

سوال:- کیا آپ نے شروع سے آخر تک اس مقدمے کی تفتیش کی ہے ؟  
جواب:- تمام تفتیش میں نے خود کی ہے۔

سوال:- آپ کی تفتیش کے مطابق، کانسٹیبل عبدالوہاب، کانسٹیبل محمد عابد اور آیت اللہ SHO ملزم ہیں یا نہیں ؟

جواب:- میری تفتیش کے مطابق مندرکہ بالا کسان ملزم نہیں ہیں کیوں کہ نہ تو کوئی ثبوت ہے۔ اور نہ ہی مدعی دعویٰ داری کرتا ہے اور آیت اللہ کی Vitz موٹر

کار جس پر شک تھا۔ مدعی اور مغوی دونوں سے شناخت کروانی مگر یہ گاڑی نہیں ہے۔

Similarly the statement of complainant Mst: Fatima Gul also establishes the innocence of the appellants. The statement of complainant is worth perusal for the end of justice. She was put to a question by the Inquiry Officer as to whether Ayat Ullah (appellant), Abdul Wahab and Muhammad Abid, who are present before you were present during the proceeding of abduction of your son and whether any one or two were present at the time of commission of offence? She categorically denied and said none of them were present at the time of commission of the offence and she has seen them (Ayat Ullah, Abdul Wahab and Muhammad Abid) for the 1<sup>st</sup> time in your office. The relevant portion of the statement is reproduced as under:-

سوال:- کیا محمد عابد کانسٹیبل، عبدالوہاب کانسٹیبل، SI آیت اللہ میں سے کوئی بھی بوقت وقوعہ موجود تھا یا کسی ایک سے یا دو سے یا تینوں نے آپ کے بیٹے کو اٹھا کر ساتھ لے گئے؟

جواب:- ان تینوں میں سے کوئی بھی موجود نہیں تھا۔ ہم دونوں میاں بیوی نے ان کو آپ کے آفس میں پہلی مرتبہ دیکھ لیا ہے۔

Similarly alleged abductee Muhammad Ali was also examined and cross examined by the Inquiry Officer, whereby he also categorically declared that the appellants and his gunners are innocent. He was also put to a question as to whether SI Ayat Ullah (appellant), Constable Abdul Wahab and Constable Muhammad Abid, who are standing before you were the person, who have participated in your abduction? He denied and said none of them were present in alleged abduction process and he can identify the accused if they are brought before him. The relevant portion of the statement is reproduced as under:-

سوال:- جو پولیس اہلکاران SI آیت اللہ، کانسٹیبلان عبدالوہاب اور محمد عابد جو آپ کے سامنے کھڑے ہیں بروقت وقوعہ ان میں سے کوئی اہلکار تو نہیں تھا؟

جواب:- ان تینوں میں کوئی بھی شخص نہیں تھا۔ اگر وہ اہلکار میرے سامنے آجائیں تو میں پہچان سکتا ہوں۔

The statement of all witnesses are worth perusal for the end of justice and for the end of procuring and establishing the innocence or other wise of the appellants and his fellow police personals. It is crystal clear from the perusal of whole statements of all witnesses recorded by the inquiry officer that the appellants and his fellow police constable are not involved in the alleged accusation.

From the bare perusal of the statements recorded by the Inquiry Officer; appellant cannot be held to be guilty of the alleged charges rather the statement established the innocence of the appellant.

So far the findings of the inquiry officer are concerned the same is based on surmise and presumption and that too without any support of reason and evidence. In presence of direct evidence no adverse presumption can be drawn. Adverse presumption drawn by the Inquiry Officer against the appellant is against legal norms and justice.

The law in the country is still unchanged and is governed by law of Qanoon-e-Shahadat in Vogue and by virtue of the same, the competent authority has to see, that it is for the prosecution to establish the guilt of the person and if it fails to do so, the result is that benefit goes to the accused of the said failure. It is significant that while referring to civil servant, who is being proceeded against under the Govt: Servant (Efficiency and Discipline) Rules or as the case may be under Police Rules 1975; the word "accused" has been used which indicates that the proceedings conducted by the inquiry officer are akin to a criminal trial [1996 SCMR 127]. A person is presumed to be guilty of misconduct if evidence against him establishes his guilt. The use of the word "guilty" is indicative of the fact that the standard of proof should be akin to one required in criminal cases [ PLD 1983 SC (AJ & K) 95]. In the instant case prosecution has no evidence to establish the alleged allegations against the appellant rather have been exonerated by witnesses as evident from the statement recorded by the inquiry officer.

The Inquiry Officer in his finding has only relied upon the alleged CDR, which is no evidence in the eyes of law. The Hon'ble Supreme Court of Pakistan vide reported Judgment 2021 SCMR 522 has held that apart from positive finding of Forensic test, the prosecution has to prove end to end call i.e conversation from both sides and the identification of persons, who made conversions, The wording of the relevant portion of judgment are reproduced as follow:-

*“ Evidentiary value and admissibility of CDR.....Mere production of CDR data without transcripts of the calls or end to end audio recording could not be considered/used as evidence worth reliance.....Beside the call transcripts, it should also be established on the record that the callers on the ends were the same person, whose calls data was being used in evidence.....While considering such types of evidence extra care was required to be taken by the courts as advancement of science and technology had*



*also made it very convenient and easy to edit and make changes of one's choice...."*

In the present case no such evidence as per requirement of law laid down by the Hon'ble Supreme Court of Pakistan is available with Inquiry Officer to hold the appellant as guilty.

It is further humbly submitted that the appellant is a civil servant/public servant and any citizen can contact him. There is no legal restriction that SHO cannot be contacted through his mob:/ cell number by general public.

It is further humbly submitted that appellant has remained investigation officer in thousand of criminal cases; he knows the value of mobile contact and has traced numerous culprits on mobile contacts. The question is how a prudent mind can safely presume that a person who has remained a qualified investigating officer can make telephonic contact with a criminal, who is going to commit an offence and that too of abduction. The answer is certainly negative.

- C. That as per rule 14 (1), the competent authority is legally bound to scrutinize the findings report of the inquiry officer and weight the same as to whether it prove the guilt of the accused civil servant or otherwise. In the instant case no such efforts have been made on the part of competent authority therefore the impugned penal order is not only illegal but in my humble highly undesirable and unwarranted.
- D. That the identical and similar appeal of the co-civil servant (co-accused), who were also got involved along with appellant in the same case have been re-instated by this Honorable Tribunal with all back benefits therefore appellant also deserve the same treated (Annexure-N)
- E. That the well-known principle of law "Audi altram Partem" has been violated. This principle of law was always deemed to have embedded in every statute even though there was no express specific or express provision in this regard. ...An adverse order passed against a person without affording him an opportunity of personal hearing was to be treated as void order. Reliance is placed on 2006 PLC(CS) 1140. As no proper personal hearing has been afforded to the appellant before the issuing of the impugned order, therefore, on this ground as well the impugned order is liable to be set aside.
- F. That the non provision of the inquiry report amounts to deprive a civil servant from confronting and defending himself from evidence that may go against him, which is against the provision of Article 10A of the Constitution of Pakistan, 1973.

- G. That appellant has been condemned unheard being deprived of the right personal hearing.
- H. Accused is stated to be a favorite child of law and he is presumed to be innocent unless proved otherwise and the benefit of doubt always goes to the accused and not to the prosecution as it is for the prosecution to stand on its own legs by proving all allegations to the hilt against the accused. Mere conjectures and presumption, however strong, could not be made a ground for removal from service of civil servant [1999 PLC (CS) 1332 (FST)]..... Unless and until prosecution proves accused guilty beyond any shadow of doubt, he would be considered innocent [1983 PLC (CS) 152 (FST)].
- I. That Re-instated employee would be entitled to back benefits as a matter of course unless employer is able to establish by cogent evidence that concerned employee had been gainfully employed elsewhere. In this respect, initial burden would lie upon the employer and not upon the employee to prove that such employee was gainfully employed during period of termination from his service. 2010 TD (Labour) 41.
- J. That Civil servant who was dismissed from service through arbitrary and whimsical action of the government functionaries and re instated through judicial order of Service Tribunal would have every right to recover arrears of salaries by way of back benefits due to them during the period of their dismissal and re instatement. It would be very unjust and harsh to deprive them of back benefits for the period for which they remained out of job without any fault on their part and were not gainfully employed during that period.....Supreme Court allowing their appeal and directing payment of back benefits to the appellant. 2006 T D (SERVICE) 551 (a).
- K. That the penal order is not a speaking order for the reason that no solid and legal grounds have been given by the penal authority in support of his penal order. On this score the impugned order is liable to be set aside.
- L. That appellant would like to seek the permission of Your Kind Honoure for award of personal hearing. Appellant may kindly be granted the opportunity of personal hearing.

*Ayat Ullah*  
Appellant

Through

*Ashraf Ali Khattak*  
Ashraf Ali Khattak  
Advocate,  
Supreme Court of Pakistan

Dated: 31/12/2021

**BEFOR THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

SERVICE APPEAL No. \_\_\_\_\_/2021

Ayat Ullah,  
SHO,  
Police Station, Cantt:  
Kohat..... Appellant.

**Versus**

The Regional Police Officer,  
Kohat Region Kohat and others..... Respondents.

**AFFIDAVIT**

I, **Ayat Ullah**, SHO, Police Station, Cantt: Kohat, do hereby solemnly affirm and declare on oath that the contents of this service appeal are true and correct to the best of my knowledge, and nothing has been concealed from this Hon'ble Court.

*Ayat Ullah*  
Deponen



(13) (13)

3

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

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

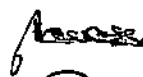
Statement of Muhammad Ali aged about 14/15 years s/o Israr Khan r/o Mohallah Mian Badshah Kohat. City u/s 164. Cr.PC. on oath

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

Certified u/s 364 Cr.PC

RO & AC  
05.12.2019

Ali  
Muhammad Ali

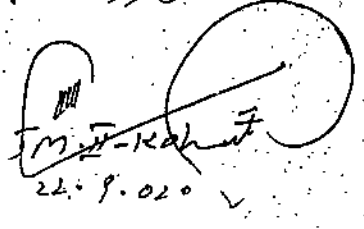
  
**Tariq Abbas**  
Senior Civil Judge/Judicial  
Magistrate u/s 30 Cr.P.C, Kohat  
**Senior Civil Judge**  
Judicial Magistrate Kohat

بیان اذہن صاحبہ فاطمہ بی بی بلکہ  $\frac{39}{38}$  سال زوجه اسرار سکنہ عباس مار شاہ قلم کو حوالہ دے کر  
حلفاً بیان ہے کہ میں نے اپنے بیٹے قسطلی کو اغوا کر کے لیجانے پر معلوم ملنے مان کونخلاق  
دعویداری کی تھی۔ جس میں پولیس والا بھی شامل ہے۔ میرا بیٹا بازو اب چھوڑ چکا ہے۔ اب تک  
میں اور میرا بیٹے نے کافی پولیس والوں کو بغرض شناخت چیک کیا ہے۔ لیکن اب تک سنا  
نہ کر سکا۔ اور اب میں کسی پھر بھی دعویداری نہیں کرنا چاہتی ہوں۔ یہ سر بیان

حسن کردار سے تسلیم کر

الذ فاطمہ بی بی زوجه اسرار

nic-14301-157444-4  
mob-0333-9623771

  
24.09.2020

بیان

میں نے سنا ہے کہ خاں صاحب نے کل 31 مئی کو اسٹریٹنگ کے لئے مہمان  
 بادشاہ شاہ جہاں کو اپنے ساتھ لے کر 15/7/41-14301 بجائ کر  
 وہاں کے لیے تیار ہوئے اور وہاں (کراچی) کے لیے تیار ہوئے  
 کہ جس کے لیے اس کے ساتھ ساتھ وہاں کے لیے تیار ہوئے  
 اس کے ساتھ ساتھ وہاں کے لیے تیار ہوئے  
 وہاں کے لیے تیار ہوئے  
 اور وہاں کے لیے تیار ہوئے  
 اور وہاں کے لیے تیار ہوئے

مستند  
 20  
 33

بے شک ہے

SAIK Khan

14301 - 2061087

02739626731







13

از دفتر سپرٹنڈنٹ آف پولیس انوسٹی گیشن ونگ کوہاٹ

FAX NO. 0922-9260275  
Phone No. 0922-9260274  
Email. mvlub2@gmail.com

نمبر 464/ - ایڈر مورخہ 2019 - ( )

منجانب: سپرٹنڈنٹ آف پولیس انوسٹی گیشن ونگ کوہاٹ

بجانب: ڈسٹرکٹ پولیس آفیسر کوہاٹ

عنوان: براگرس رپورٹ مقدمہ نمبر 1593 مورخہ 05.12.2019 م PPC 365 تھانہ ٹی۔

- بنام:
- 1- فرہاد ولد نصر اللہ سکندر محلہ ماہاں بادشاہ کوہاٹ۔
  - 2- زبیر ولد ریاض سکندر محلہ ماہاں بادشاہ کوہاٹ۔
  - 3- فخرانی ولد محمد شفیق سکندر محلہ ماہاں بادشاہ کوہاٹ۔

جناب عالی!

مدعی مقدمہ مورخہ 03.12.2019 کو بوقت 17:00 بجے بمقام ضری تھانہ آ کر یوں رپورٹ کی۔ کہ امر وز بصیر دیلہ وہ خانہ خود میں موجود تھی۔ بوقت 16:30 بجے گھر کے دروازے پر دستک ہوئی۔ جب اس نے دروازہ کھولا تو ایک جوان جس نے پولیس وردی پہنی ہوئی تھی۔ اور چہرہ پر ماسک پہنا ہوا تھا۔ اسے کہا کہ گھر میں کوئی مرد ہوتا ہے یہ جو جس پر اس نے سیراٹ لگا کر کہا کہ اسے پولیس آئی ہوئی ہے جا کر دیکھیں۔ وہ گھر کے دروازے میں کھڑی تھی۔ پیراش محمد علی مذکورہ پولیس وردی میں ملبوس شخص موٹر کار ڈیڑز بریگ سفید نمبر نا معلوم میں بیٹھا کر اسے کہا کہ ہم اس سے کسی گھر کا پتہ پوچھتے ہیں۔ اور چلے گئے اس بات معلوم کرنے والا ہوں کہ اس کے بیٹے کو پولیس کو نئے مشین لے گئے ہیں اطلاعی رپورٹ کی۔

دوران رپورٹ کی امر ز خان ولد شاد خان خاندان سماء طاہر گل مدعی حاضر تھانہ آ کر جس نے بتایا کہ عرصہ تقریباً 8 ماہ قبل اس نے اپنی اراضی 28 مرلہ واقع ڈھیری بانڈہ فرہاد ولد نصر اللہ سکندر محلہ ماہاں بادشاہ کوہاٹ میں 95 لا کھ روپے پر فروخت کی تھی۔ جس نے تاحال رقم وصول نہیں کی ہے اور جب بھی وہ فرہاد سے رقم کا مطالبہ کرتا ہے تو ناال منوال اور تعلقات ختم کرنے کا کہہ دیتے ہیں اب اسے شک ہے کہ اس کے بیٹے کو بذریعہ پولیس وردی میں ملبوس کسان اٹھا کر لے گئے ہیں اور اپنی مضموم عوام حاصل کرنا چاہتے ہے سر دست اطلاعی رپورٹ کر کے جو بحوالہ مد

36 روز نامہ 03.12.2019 درج روز نامہ ہو کر عظمت خان ASI انچارج چونکہ تحصیل پوسٹ نے حسب ہدایت افسران (III) 156 ضف شروع کر کے حسب نشاندہی مدعی نقشہ موقع مرتب کی ہے۔ موقع کے نزدیک انور پبلک سکول پر نصب شدہ کیمروں میں وقوع کے مناظر موجود یا کر جو

بذریعہ USB محفوظ کر کے برائے فرد قبضہ پولیس کی گئی ہے۔ اور اسی طرح منووی علی ابراہم عرف محمد علی بوقت 22:50 بجے رات تھانہ ٹی آ کر بیان کیا کہ بروز وقوعہ گھر میں موجود تھا۔ والدہ کی آواز پر اس نے دروازہ کھولا تو سامنے دو کسان پولیس وردیوں میں ملبوس اور دو کسان سادہ کپڑوں میں

کھڑے موٹر کار ڈیڑز بریگ سفید بلا نمبر میں بیٹھا کر اس دوران ایک شخص پولیس وردی میں مجھ سے کہا کہ SHO بلا رہا ہے اور مجھے دھکا دے کر گاڑی میں بیٹھایا اور میرے چہرے پر ماسک پہنایا۔ ماسک کی وجہ سے مجھے آگے کچھ نہیں دیکھ رہا تھا اور یہ کسان اردو، پشتو اور ہندکو زبان میں باتیں کر رہے

تھے اور کچھ مختلف گاڑیوں میں اتار بیٹھا ہے تھے۔ جس میں ایک شخص نے مجھ سے کہا کہ میری والدہ سخت بیمار ہے اور اپنی والدہ کو کہہ دے کہ ایک کروڑ روپے کا ہندو بسپت کرے۔ ورنہ آئندہ ایسا نہیں ہوگا۔ کئی وقت گزرنے کے بعد آخر کار ایک گاڑی میں گاڑی سے اتار کر خود چلے گئے۔ میں

نے ماسک چہرے سے ہٹایا رات کا وقت تھا نزدیک موجود لوگوں سے معلوم ہوا کہ یہ گاڑی ڈھوڑہ شریف ہے۔ اس دوران ایک موٹر کار آ کر کھڑا کرنے کا اشارہ دیا جس میں دو کسان سوار تھے موٹر کار میں موجود کسان کی سواباں پر اپنے والد امرار کے ساتھ بات کر کے نے مجھے تھانہ ٹی لے آیا۔ جس کی

رپورٹ پر مد 36 روز نامہ 03.12.2019 درج روز نامہ کے عہدہ خان ASI نے محمد علی کا بیان زیر دفعہ 161 ض ف قلمبند کر کے۔  
 مورخہ 05.12.2019 کو عدالت میں زیر دفعہ 164 ض ف قلمبند کر کے جس پر مقدمہ علت 1593 مورخہ 05.12.2019 PC  
 تھانہ شاہ درج رجسٹر کر کے بغرض تفتیش میں OII/SAI کو حوالہ کر کے ابتدائی رپورٹ میں مدعیہ مسماۃ فاطمہ گل بی بی اور اس کے خاوند اسرار خان نے  
 فرہاد ولد نصر اللہ سکنہ گڑھی ڈھوڑ یوال پر شک ظاہر کی ہے۔ کسی فرہاد کے موبائل نمبر 0333-9999797 کے CDR حاصل کر کے پڑھنا  
 CDR پر کسی فرہاد بروز قوعہ و قوعہ سے قبل اور بعد میں مسیان زبیر ولد ریاض، قذافی ولد محمد شفیق ساکنان گڑھی ڈھوڑ یوال، شہزاد ولد صالحین سکنہ  
 حافظ آباد، SHO آیات اللہ خان تھانہ کینٹ اور اس کے گٹر کانسٹیبل عبدالوہاب، محمد عابد کے ساتھ رابطے بار بار کی گئی ہے۔ مسیان زبیر، قذافی جبکہ  
 شہزاد، فرہاد آپس میں پراپرٹی پارٹنر ہیں اور اس طرح زبیر، قذافی، آیات اللہ خان SHO کانسٹیبلان عبدالوہاب، محمد عابد کے CDR بھی حاصل  
 کر کے کسی فرہاد کے ساتھ بار بار رابطے ہوئے ہیں۔

اس سلسلہ میں کانسٹیبلان عبدالوہاب، محمد عابد اور آیات اللہ SHO کو طلب کر کے شامل تفتیش کر کے انٹارویو کر کے پراپرٹی  
 عبدالوہاب نے بتایا کہ وہ بروز قوعہ مورخہ 03.12.2019 کو صبح سے لے کر شام تک SHO آیات اللہ خان کے ساتھ ڈیوٹی پر تھا۔  
 کانسٹیبل محمد عابد کو انٹارویو کر کے بتلایا کہ 26.11.2019 سے آیات اللہ خان SHO نے زبانی چھٹی دی تھی اور  
 مورخہ 03.12.2019 کو وہ گھر واقع کوہاٹی ڈھوک بلی ٹنگ سے سبزی منڈی کی ایک خام داڑھی اور سر کے بال بنوانے اور شام کو اپنے موٹر سائیکل  
 براستہ تحصیل گیت میاں خیل بازار، پرانہ صدر تھانہ روڈ کو جانا بیان کیا۔ اور اپنا موبائل تھانہ بھول جانا بیان کیا۔

اسی طرح آیات اللہ خان SHO نے بتلایا کہ وہ کسی فرہاد سے کسی افسر کو کابل مانگے تھے اور کئی دفعہ اس بابت فرہاد، شہزاد کے ساتھ اپنے  
 موبائل پر رابطے کئے ہیں۔ اور مسیان فرہاد، شہزاد نے بھی آیات اللہ خان کے ساتھ کئے ہیں۔ اور ان کے کہنے پر بھی کانسٹیبل عبدالوہاب، شہزاد وغیرہ  
 کے ساتھ رابطے کئے ہیں۔ اور شہزاد سے تھانہ کینٹ کابل وغیرہ پہنچائے تھے۔

کسی فرہاد ولد نصر اللہ، زبیر ولد ریاض، قذافی ولد محمد شفیق کو مقدمہ ہذا میں چارج کر کے ملزمان ٹھہرائے گئے ہیں اور کسی فرہاد ولد نصر اللہ  
 نے عدالت ASJ-IV صاحب سے قبل از گرفتاری ضمانت کروا کر جس میں 19.12.2019 مقرر تھی۔ مدعیہ مسماۃ فاطمہ گل اور اس کا خاوند اسرار  
 خان نے ان کے ساتھ عدالت میں پیش ہو کر بقاعدہ شامپ پیپر تحریر کر کے کہ ہم کسی پروغویہ اداری نہیں کرتے ہیں۔ فرہاد کا BBA کنفرم ہوا اور بقایا  
 کسان زبیر اور قذافی نے بھی BBA کروا کر جس میں تاریخ کنفرمیشن 06.01.2020 مقرر ہے۔

مدعیہ اور منوی محمد علی سے موٹر کار و بیڈز برنگ سفید نمبر نام معلوم کی شناخت کر کے انہوں نے بتلایا کہ یہ موٹر کار و بیڈز انہوں نے  
 جہاں تک تفتیش پایا جاتا ہے وہ درست پولیس CDR کے علاوہ کوئی شہادت نہیں مل رہی ہے اور قذافی نے بھی کسی پروغویہ اداری کرنے کو تیار

نہیں ہے۔ صرف اور صرف پولیس کے کنڈھوں پر بندوق چلا رہا ہے۔ پراگرس رپورٹ عرض ہے۔

سپرٹنڈنٹ آف پولیس انوشی کیشن ونگ کوہاٹ

Anx C

(19)



No. 59035-26/PA

Office of the  
District Police Officer,  
Kohat

Dated: 27/12/2019

CHARGE SHEET

I, CAPT @ MASNOOR AMAN, DISTRICT POLICE OFFICER, KOHAT, as competent authority under Khyber Pakhtunkhwa Police Rules (amendments 2014) 1975, am of the opinion that you SI Ayat Ullah SHO PS Cantt rendered yourself liable to be proceeded against, as you have committed the following act/omissions within the meaning of Rule 3 of the Police Rules 1975.

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

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

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

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

4. A statement of allegation is enclosed.

Received by:

M. Abid

Attest  
[Signature]

DISTRICT POLICE OFFICER,  
KOHAT

[Signature]  
27/12



No 59225-2C/PA

Office of the  
District Police Officer,  
Kohat

Dated 27-12-2019

20

10

**DISCIPLINARY ACTION**

I, **CAPT @ MANSOOR AMAN, DISTRICT POLICE OFFICER, KOHAT** as competent authority, am of the opinion that you **SI Ayat Ullah SHO PS Cantt** have rendered yourself liable to be proceeded against departmentally under Khyber Pakhtunkhwa Police Rule 1975 (Amendment 2014) as you have committed the following acts/omissions.

**STATEMENT OF ALLEGATIONS**

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

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

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

**DISTRICT POLICE OFFICER,  
KOHAT**

No. 59225-2C/PA, dated 27-12-2019.

Copy of above to:

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

nx-D

(2)

﴿ جواب چارج شیٹ ﴾

۱۲

جناب عالی!

بحوالہ چارج شیٹ مجازی نمبر 26/PA-59025 مورخہ 27.12.2019 ذیل جواب عرض ہے۔

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

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

جناب عالی!

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

سید انسپٹر آف ایٹم اللہ خان باجوڑ

1-1-25

Allah

Anx-E

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No. 36 JFA

Dated 16-1-2020

DEPARTMENTAL ENQUIRY AGAINST SI AYAT ULLAH

Respected Sir,

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

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

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

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

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

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

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

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

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

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

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

Submitted please.

WDPO Kohat

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

## بیان ازان انور شاہ Oll تھانہ شی کوہاٹ

جناب عالی

بیان کرتا ہوں کہ مورخہ 03.12.2019ء مدعیہ مسماۃ فاطمہ گل زوجہ اسرار خان سکند گڑھی ڈیوڑ وال نے اپنے پسر اش محمد علی کے لاپتہ ہونے، نامعلوم ملزمان رپورٹ کر کے رپورٹ میں انہوں نے شک ظاہر کیا تھا کہ سہمی فرہاد گل ولد نصر اللہ خان سکند گڑھی ڈیوڑ وال پر 28 ستمبر 2019ء واقع ڈھیری ہانڈہ مبلغ 95 لاکھ روپے فروخت کیا تھا جب اسے مذکورہ فرہاد سے رقم کا مطالبہ کرتا ہے تو مذکورہ اسکے ساتھ تعلقات ختم کر دیتا ہے اور رقم دینے میں نال منول سے کام لے رہا ہے۔ اسے شک ہے کہ اسکے بیٹے محمد علی کو نامعلوم کسان پولیس دردی میں ملبوس کہیں لے گئے ہوں۔ جس کی رپورٹ بحوالہ 26 روزنامہ 03.12.2019 تھانہ شی درج روزنامہ کے جس پر انکواری (iii) 156 شروع کرنے عظمت خان ASI انچارج چوکی تحصیل پوسٹ نے انکواری شروع کر کے بدوران انکواری مغوی محمد علی ولد اسرار خان بازیاب ہو کر خود بخود تھانہ حاضر آ کر جسکا بیان زیر دفعہ 161 ضف لیا جا کر بعد میں عدالت میں بیان زیر دفعہ 164 ضف قلمبند کر کے انہوں نے بھی نامعلوم ملزمان جس میں دو کسان پولیس دردی میں ملبوس اور چہروں پر ماسک پہنے ہوئے تھے، دعویداری کی۔ بعدہ مورخہ 05.12.2019 کو مقدمہ درج رجسٹر ہو کر بغرض تفتیش سن Oll حوالہ ہو کر بدوران تفتیش مذکورہ فرہاد کا موبائل (0333-9999797) کا ڈیٹا حاصل کر کے مذکورہ نے وقوعہ سے قبل اور وقوعہ کے روز موبائل نمبر 0332-9770151 اور 0334-8287677، 0333-9634123، 0336-8863183، 0335-5556550 حاصل کر کے جبکہ موبائل نمبری 0335-5556550 تذاوی ولد محمد شفیق اور 0336-3631313 پر رابطہ ہوئے ہیں جن کے بھی CDR حاصل کر کے جبکہ موبائل نمبری 0335-5556550 تذاوی ولد محمد شفیق اور موبائل نمبری 0336-8863183 زیر ولد ریاض ساکنان گڑھی ڈیوڑ وال اور موبائل نمبر 0336-3631313 ملک شہزادہ ولد صالحین سکند حافظ آباد کے نام پر ہے اور اسی طرح موبائل نمبر 0333-9634123 آیت اللہ (سابقہ SHO تھانہ کینٹ) جبکہ موبائل نمبر 0334-8287677 کا نشیبل عبدالوہاب اور موبائل نمبری 0332-9770151 کا نشیبل محمد عابد کے نام پر ہیں۔ مذکورہ آیت اللہ خان SHO اور کاشیبلان محمد عابد عبدالوہاب کو مقدمہ ہذا میں شامل تفتیش کر کے مقدمہ میں انکار دینے کے SHO آیت اللہ خان نے بتلایا کہ وہ بروز وقوعہ سے قبل اور وقوعہ کے بعد کسی فرہاد اور ملک شہزادہ کے ساتھ ذاتی کام کے سلسلے میں بات چیت کی تھی اور اسی طرح کا نشیبل عبدالوہاب نے بھی SHO صاحب کے کہنے پر بات چیت کی ہے۔ کا نشیبل محمد عابد بروز وقوعہ سے لیکر تقریباً شام تک SHO صاحب کے ساتھ موجود تھا۔ شام کے بعد اپنی موٹر سائیکل پر راستہ تحصیل گیت امیاں خیل بازار اور پرانا تھانہ صدر دروازے گھر خود جانا بیان کیا۔ اسی طرح مدعی مقدمہ اور مغوی محمد علی کو بھی تھانہ طلب کر کے موٹر کار Vitz نمبر نامعلوم بریگ سفید جو تھانہ صدر کمال مقدمہ تھا۔ SHO آیت اللہ خان تھانہ کینٹ کے زیر استعمال میں تھا۔ موٹر کار کو UMT سن میں مدعیہ مسماۃ فاطمہ گل بی بی و مغوی محمد علی کو دکھلایا۔ مغوی محمد علی نے اصرار کیا کہ انکے آنکھوں پر پٹی ہانڈہ کر گاڑی میں بیٹھا کر اور گاڑی میں چکر دیں تاکہ میں گاڑی کی صحیح شناخت کر سکوں۔ مغوی کے کہنے پر مغوی بعد مدعیہ بعدہ ہیڈ کا نشیبل عقیل حسین و کا نشیبل مقبول حسین، سن Oll نے گاڑی میں بیٹھ کر گاڑی کو MT سے نکال کر تنگو چھانک، تنگو چھانک سے بائی پاس روڈ پشاور، OTS روڈ پشاور MT آ کر مغوی نے بتلایا کہ یہ گاڑی نہیں ہے جس میں مجھے اغوا کیا تھا۔ اس گاڑی میں ڈرائیور اور فرنٹ سیٹ کے درمیان ہاتھ سپورٹر اور پیچھے سیٹ میں آگنی ہیلت نہیں تھا جبکہ اسی گاڑی میں موجود ہے۔ مذکورہ مدعیہ و مغوی سے فرد شناخت موٹر کار بھی علیحدہ مرتب کی گئی ہے۔ چونکہ کسی فرہاد اور دیگر کسانان ہذا ظہر واقعہ کو مقدمہ ہذا میں اپنی طرف سے چارج کر کے پرانہ نامزدگی ملزمان بھی جاری کی گئی ہے۔ مذکورہ کسان نے عدالت ASJ-IV سے ضمانت قبل از گرفتاری کروا کر تاریخ پیشی پر مدعیہ مسماۃ فاطمہ گل بی بی و مغوی محمد علی اور مدعیہ کا خاندان محمد امیر ارچش ہو کر باقاعدہ مشاہدہ سبب پتہ بھی تحریر کیا ہے۔ مذکورہ پر کسی قسم کی دعویداری نہیں کی چونکہ مقدمہ میں مدعی پہلے سے موجود ہے۔ پولیس کسان صرف اور صرف فرہاد اور دیگر کسان کے ساتھ صرف بات چیت کی گئی ہے اور مغوی کو Vitz موٹر کار بھی دکھایا گیا ہے اور کاشیبلان کا بھی شناخت کر کے مدعیہ اور مغوی نے پولیس اہلکاران کو شناخت نہیں کیا ہے کہ یہ نہیں ہیں۔ تفتیش سے نامزد ملزمان کے علاوہ پولیس اہلکاران کے خلاف کوئی ٹھوس ثبوت دستیاب نہیں ہوا۔ یہی میرا بیان ہے جو حقیقت پر مبنی ہے۔

دستخط



سوال: کیا آپ شرع سے آخر تک اس مقدمہ کی تفتیش کریں گے؟  
جواب: تمام تفتیش میں خود کیا جائے

سوال: آپ کی تفتیش کے مطابق، کینسل عبدالوہاب، کینسل محمد عابد اور ایم ایف ایف SAO ملزم ہیں یا نہیں۔

مدعی تفتیش کے مطابق استذکرہ والا کسان ملزم نہیں ہیں۔  
کتونہ نہ تو کوئی ثبوت ہے۔ اور نہ ہی مدعی دستوراً ہی کرنا  
اور آئیگ ایف کی Viti نوٹس کار جس پر مشتمل تھا۔  
مدعی اور مدعی دونوں سے شناخت کروائی مگر  
یہ چھاپی ہوئے ہیں۔

سوال: یقیناً ملزمان کے کتا نام ہیں۔  
جواب: 1۔ فریاد ولد عبداللہ جو کہ زبیر ولد میاں ہیں۔  
قدافی ولد محمد شمس کسان کتا کی ڈوڈیوال  
ملزمان ہیں جنکو حالان مقدمہ کہتے ہیں۔

ایف ایف ایف  
14/11/2020

اللہ

sp-ops

14/11/2020

بیان ازان اسرار خان ولد نثار خان سکندہ محلہ گڑھی مواز خان کوہاٹ

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

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

یہی میرا بیان ہے جو حقیقت پر مبنی ہے۔

تحریر: 06.01.2020

دستخط



بیان مسماة فاطمہ گل زوجہ اسرار خان سکنتہ گڑھی عطا خان محلہ میاں خیل

شناختی کارڈ نمبر 4-1574411-14301 موبائل نمبر

(9)

(27)

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

تحریر: 06.01.2020

دستخط

مولانا محمد عابد کنیٹیل عبدالوہاب کنیٹیل سے کہتے ہیں کہ ایک بار وہ اپنے بیٹے کو لے کر گیا اور وقت وقوع وقوع تھا یا کسی ایک بار وہ اپنے بیٹے کو لے کر گیا۔

جواب :- ان سب کو میں سے کوئی بھی موجود نہیں تھا ہم دونوں میاں خیل نے ان کو ایک امس میں کھولی دیکھ لیا ہے

6/1/2020

اسرار خان

بیان از ان ملک فرہاد بخش ولد نصر اللہ خان مکینہ گڑھی ڈھولوال کوہاٹ،

شناختی کارڈ نمبر 7-90211119-14301 موبائل نمبر 9999797-0333

حلفاً بیان کرتا ہوں کہ SHO آیت اللہ خان تھانہ شی میں SHO تعینات رہنے کے بعد میرا تعلق دار  
بن گیا اور میں نے مختلف جرائم کی سزاؤں میں ہر قسم کی مدد و تعاون فراہم کیا ہے اور اب بھی دقتاً فوقتاً سماج دشمن عناصر کے نام دیکر جس  
کو روکنے ہاتھوں گرفتار کر دیا ہے۔ مورخہ 03.12.2019 کو SHO آیت اللہ اور گنر عبدالوہاب کے ساتھ کو جرائم پیشہ عناصر  
کی بابت خفیہ اطلاع کے سلسلے میں کئی بار ٹیلی فونک روابط ہوئے ہیں۔ نہ میں اس مقدمہ میں ملوث ہوں۔ چونکہ میں ایک مہذب  
پاکستانی شہری ہوں، بحسبیت پاکستانی شہری کوہاٹ پولیس کے ساتھ جرائم کے روک تھام میں ہر قسم کی جان و مال کا کئی ہے اور مزید بھی  
کرتار ہوگا۔ جبکہ موجودہ SHO تھانہ شی فیاض جو کہ میرے ساتھ ذاتی عداوت ابدی کی بنا پر مجھے مقدمہ ہذا میں بے گناہ طور پر  
ملوث کیا۔ قبل ازیں بھی مذکورہ SHO نے میرے ساتھ سال 2012/2013 کو میں ہمراہ اپنے مستورات کے بطرف جانانہ  
میل جا رہے تھے، اس وقت فیاض ASI تھا، جس نے مجھے ہتھیاری گاڑی کو روکا اور مجھے گاڑی سے اتار کر میرے گھر کے مستورات  
کے سامنے مجھے نہایت نازیبا الفاظ کہے اور زدوکوب کیا جس پر میں نے سابقہ مینسٹر قلب حسن کو فون کیا جس نے فیاض کو فون کر کے  
مجھے موقع پر چھوڑ دیا لیکن مذکورہ نے مجھے جاتے جاتے یہ دھمکی دی کہ آج تو مینسٹر نے پچایا ہے لیکن آئندہ آگے ساتھ دیکھوگا۔  
اس کے بعد SHO فیاض نے تھانہ شی میں تعینات ہوتے ہی مجھے فون کر کے تھانہ بلایا اور کہا کہ علیم حیدر رپورٹر کے کیس میں  
میرے ساتھ تعاون کرو اور بعد میں مجھے اسی مقدمہ میں ہی چارج کیا جس کا یہ فعل بھی ذاتی عداوت ہے۔ اور ابھی بھی مجھے فون کر کے  
تھانہ بلایا اور مقدمہ علت 1593 میں بے گناہ طور پر ملوث کیا۔ چونکہ SHO فیاض کا سماء تابندہ کے ساتھ تعلق ادوستی ہے جس  
کے ساتھ میری بھی دوستی ہے اور SHO مذکورہ مجھے بار بار باز آنے کا کہا اور جس دن اس نے مجھے تھانہ بلایا اسی دن میرے موبائل  
لیکچر کہا کہ اس میں تابندہ کی تصویریں ہیں اسکو ڈیلیٹ کرو۔ جس کے بعد SHO نے خود تصویریں ڈیلیٹ کر کے جس کی ثبوت اگواہ  
میرے ساتھ موجود ہے اور پیش کر سکتا ہوں۔

یہی میرا بیان ہے جو حقیقت پر مبنی ہے۔

تحریر: 07.01.2020

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Handwritten signature and initials.

کرامی سوالات

سوال: آئی کے جی کے کون کون سے فون کیا گئے تھے۔

جواب: آئی کے جی کے فونیشن کے لئے اور ڈی آئی کے (پہلے) کے لئے اس سلسلے میں آئی کے اور آئی کے سے کئی سرٹیکس و ایچ کے کیا گئے۔

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

جواب: آئی کے کے SHO صاحب سے آئی کے کے لئے اس وقت سے میرے پاس

اور آمد کے سلسلے میں رٹنار میں ڈیپارٹمنٹ کے پاس آئی کے

سوال: آئی کے کے لئے آئی کے کے ساتھ لٹل کے ساتھ لٹل کے لئے

جواب: آئی کے کے لئے آئی کے کے لئے آئی کے کے لئے آئی کے کے لئے

سوال: لٹل کے لئے لٹل کے لئے

سوال  
  
سوال

Attestd  
J. J. J.  
7/11/2020

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بیان اذان محمد علی ولد اسرار خان ہجر 13/14 سال سنہ محلہ گڑھی موہان خان کوہاٹ

حلفاً بیان کرتا ہوں کہ مورخہ 03.12.2019 بوقت 16:30 بجے میں اپنے گھر خود میں موجود تھا کہ والدہ ام نے کہا کہ باہر جاؤ پولیس والے آپ سے کچھ معلومات کر رہے ہیں۔ جب میں باہر آیا تو میری تلاشی لینا شروع کی اور یہ کہا کہ آپ محمد علی ہو۔ SHO صاحب گاڑی میں بیٹھے ہیں اور آپ کو بلارہے ہیں۔ گاڑی میں نوکل چار اہلکاران جن میں دو اہلکار پولیس کی وردی میں ملیں تھے، مجھے ماسک پہنا کر ہاتھ پکلی کے تار سے باندھ کر اپنے ساتھ گاڑی میں بیٹھایا اور کہیں نامعلوم جگہ لے گئے۔ تقریباً 10:30 بجے مجھے ڈھوڑہ روڈ نزد گیشن کیڈٹ کالج پر چھوڑ دیا۔ جس کے بعد ایک راگبیر نوٹ کار میں مجھے پولیس تھانہ منی لے آئے اور اپنے والدین سے ملوایا۔ میں طرمان میں سے ایک لڑم کو شکل سے سامنے آنے پر پہچان سکتا ہوں۔ مزید جو SA آیت اللہ کاشمیلان محمد عابد، عبدالواہاب جس کو میرے سامنے پیش کیے لیکن ان میں سے کوئی شخص نہیں ہے۔

یہی نمبر ایمان ہے جو حقیقت پر مبنی ہے۔


تحریر: 07.01.2020

Ali  


سوال: بر حوالہ سے اظہار ان کے کہ اس کے والدین اور محمد عابد جو بعد سے کھڑے  
 میں بروردوستان ان میں سے کوئی اظہار تو نہیں تھا۔

جواب: ان لیسٹوں میں کوئی بھی شخص نہیں تھا اگر وہ اظہار سے سامنے آتا تو میں  
 یہ جان سکتا ہوں۔

Attested

  
 SP - SP - let

Ali  
  
 محمد علی ولد اسرار خان

Mubinnat  
 قاضیہ علی زولہ اسرار



Annexed - A  
Page # 8

ORDER

This order will dispose of departmental enquiry against SI Ayat Ullah, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

- i. Facts of the case are that on 03.12.2019, complainant of case FIR No. 1593 dated 05.12.2019 U/S 365 PPC PS City, reported regarding taking of her/his son by a person in Police uniform.
- ii. As contemplated from report of SP Investigation Kohat, the gunners of SI Ayat Ullah namely constable Abdul Wahab and Muhammad Abid had telephonically contact with charged accused before and after the occurrence.
- iii. It was also reported that he has also in contact with the accused on the eventful day i.e before and after the occurrence.

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

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

Announced  
16.01.2020

*Attest*  
*[Signature]*

DISTRICT POLICE OFFICER,  
KOHAT  
*[Signature]* 16/1

OB No. 33  
Dated 16-01-2020

No. 230403 /PA dated Kohat the 16-1-2020

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

*accused*  
*[Signature]*

DISTRICT POLICE OFFICER,  
KOHAT  
*[Signature]* 16/1

*17/1/20*  
*[Handwritten notes]*

P- بخدمت جناب ریجنل پولیس سربراہ کوہاٹ ریجن

عنوان :- اپیل برائے بحالی سروس

جناب عالی!

معروض خدمت ہوں کہ:-

- 1- من آیت اللہ سابقہ سب انسپٹر (ایس ایچ اوقیانہ جمادنی) کو مقدمہ عدلت 1593 مورخہ 15.012.2019 جرم 365PP تھانہ سٹی کو ضلعی پولیس سربراہ کوہاٹ نے چارج شیٹ دے کر انکوٹری آفیسر ایس پی آپریشن کو مقرر کر کے انکوٹری آفیسر کے روہد چارج شیٹ نمبر 59025/IPA کا تحریری جواب دیا گیا۔ اپنے آپ کو مقدمہ سے لاتعلقی اور بے گناہ بیان کیا کیونکہ حقیقت میں میرے گنہ اور میں بے گناہ ہیں۔
- 2- مقدمہ میں تفتیشی آفیسر انور شاہ SI/OII تھانہ سٹی نے انکوٹری آفیسر کے روہد تحریری بیان جمع کر کے مذکورہ نے اپنے بیان میں واضح طور پر کہا کہ اس نے مغوی اور مدعیہ کو آیت اللہ ایس ایچ او کا زیر استعمال VITS موٹر کار بمقام MT لائن میں دیکھلا کر مغوی نے اسرار کیا کہ اس کو گاڑی میں چکر دیں تب گاڑی کی شناخت کر سکے گا جس پر OII مذکورہ نے مغوی اور مدعیہ دونوں کو باوجود کی دیگر پولیس نفری گاڑی میں بیٹھا کر پشاور پائی پاس روڈ OTS روڈ تک VITS گاڑی میں پھیرا گیا۔ MT واپس آ کر مغوی نے بتلایا کہ یہ وہی گاڑی نہیں ہے جس میں اسکو گھر سے اغواء کر کے اٹھا کر لے گئے تھے۔ بیان جمع کرنے کے بعد تفتیشی افسر پر انکوٹری آفیسر نے کراس سوالات کئے کہ آیت اللہ اور گنہ مقدمہ میں ملوث ہیں یا نہیں۔ جواب دے کر کہا کہ اس نے شروع سے لیکر آخر تک مقدمہ کی تفتیش کی ہے پولیس پارٹی کو تفتیش سے ملزمان نہ ہونا ظاہر کیا۔
- 3- انکوٹری آفیسر کے روہد مغوی محمد علی، مغوی کی والدہ مسماۃ فاطمہ گل اور مغوی کے والد اسرار خان نے پیش ہو کر تحریری بیانات دیئے ہیں جس پر انکوٹری آفیسر نے کراس سوالات کئے کہ یہ تینوں پولیس اہلکاران جو آپ کے سامنے ہیں کیا انہوں نے آپ کو اٹھا کر اغواء کیا تھا۔ جواب مغوی اور مدعیہ نے کہا کہ یہ پولیس اہلکاران نہیں ہیں اور جنہوں نے اغواء کی ہے ان اہلکاران کو سامنے آنے پر پہچان کر سکتی ہوں۔
- 4- ملزم فرہاد بخش کا بیان انکوٹری آفیسر نے لیکر جس پر کراس سوالات کر کے جواب میں کہا کہ اسکا کئی ایس ایچ او کے ساتھ تعلق ہے جسکے نام لئے ہیں اور یہ بھی کہا کہ وہ پولیس کو انفارمیشن فراہم کرتا ہے۔

جناب والا!

کسی بھی انکوٹری مقدمہ کی اصلیت اور حقیقت کے دو اہم جز ہوتے ہیں جو فیصلہ پر اثر انداز ہوتے ہیں۔

i- تفتیشی کارروائی

ii- مدعی مغوی سے شناخت پریڈ

- 1- تفتیشی آفیسر کے بیان اور تفتیش کے مطابق ہم پولیس اس مقدمہ سے مراد ہیں کیونکہ میرے زیر استعمال VITS گاڑی کو مغوی اور مدعیہ سے دوران تفتیش شناخت پریڈ کرائی گئی ہے جو عدم شناخت بیان ہوئی ہے۔
  - 2- مغوی اور مدعیہ سے دوران انکوٹری بذات خود انکوٹری آفیسر نے ہم پولیس نفری کا اپنے دفتر میں روہد شناخت پریڈ کرنا کہ بقول مدعی اور مغوی ہم وہ پولیس اہلکاران نہ نکلے جنہوں نے وقوعہ کے دوران پولیس کی وردی پہنچی تھی۔
  - 3- چارج شیٹ جمع کرانے پر انکوٹری آفیسر نے میرے اوپر کسی قسم کے کراس سوالات نہیں کئے۔ فائل شوکار نوٹس اسی دن جاہلی کیا اور مجھے نوکری سے برخاست کیا گیا۔
- نوٹ:۔ نہ ہی مجھے اردنی روم میں پیش کر کے صفائی کا موقع دیا گیا ہے جو کہ انصاف کے تقاضوں کے برعکس ہے۔

- 4- ایسے ملزمان جو پولیس نے مقدمہ میں خود چارج کئے اور ان ملزمان کے حق میں مدعی فریق نے عدالت میں بیان ریکارڈ کر کے ملزمان کی عبوری ضمانت کنفرم ہوئی ہے اگر نامزد ملزمان کا تصور نہیں تو مجھے صرف نامزد ملزمان کے ساتھ رابطہ کی وجہ سے سزا دی گئی ہے جو درست فیصلہ نہیں ہے۔





حالا نكده من آيت الله عرصه 10 سال سے مختلف تقانوں ميں ايس ايج او Oll وچكى انچارج بٹ نكك انچارج رها ہوں اور اس طرح تقانہ مشى ايس ايج او بھى رها ہوں۔ ايسے ميں نامزد ملزمان كے ساتھ موبائل رابطے محكمہ پوليس كو انفارميشن كے تعلق پرمي ہيں تاكہ مجرمانہ سوچ پر رابطے كئے ہيں۔  
جناب والا!

باوجود انكے كے من آيت الله كے خلاف دوران انكوائري كوئى بھى ثبوت نہ ملا كيونكہ ميں بے گناہ ہوں ليكن انكوائري آفيسر نے بالا آفيسر كو Major Punishment كا لكھ جس ميں مجھے اور ميرے گنز كو محكمہ پوليس سے برخاست كيا جو ميں روكرتا ہوں كيونكہ انكوائري ميں ظاہر ہونے والے حقيقت كو نظر انداز كر كے متصفانہ فيصلہ نيمس كيا گيا ہے ميں اس فيصلے كو اندھا فيصلہ قرار ديتا ہوں جو كہ ميرا قانونى حق ہے۔

استدعا ہے كہ مندرجہ بالا حالات كو پيش نظر ركھتے ہوئے سائل كى اپيل كو منظور فرما كر محكمہ پوليس ميں نوكرى پر بحال كيا جائے۔

تحرير 20.01.2020

بہ حجلہ مانع ذن مشبوت پہ لفظ ہے

العارض

دايت الله سابقہ SI کوہاٹ

POLICE DEPTT:

KOHAT REGION

Annexure D

(34)

(13)

ORDER.

This order will dispose of a departmental appeal, moved by Ex-Offg: SI Ayat Ullah of Kohat district against the punishment order, passed by DPO Kohat vide OB No. 33, dated 16.01.2020 whereby he was awarded major punishment of dismissal from service on the following allegations:-


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

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

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

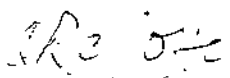
**Order Announced**  
25.06.2020

3473  
8/7/2020

  
(TAYYAB HAFEEZ) PSP  
Region Police Officer,  
Kohat Region.

No. 6297 /EC, dated Kohat the 6/7 /2020.

Copy to DPO/Kohat for information w/r to his office Letter No. 1502/LB, dated 29.01.2020. His Service Record containing 02 Service Book & Fauji Missal / Enquiry File is returned herewith.

  
8/7/2020



Anx-G (35)

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal 3325 2020

Ayat Ullah Ex- SI District Police Kohat

(Appellant).

VERSUS

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

(Respondent)

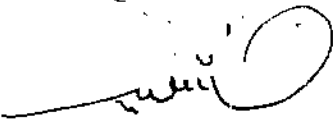
INDEX

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4	Copy of impugned Order dated 16-01-2020 and charge sheet with reply and FCN	A	8-12
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6	Wakalatnama	C	

  
Ayat Ullah  
Appellant

Through

Date 24/4/20

  
Syed Mudasir Pirzada  
Advocate HC  
0345-9645854

36

522

CDR = 2021SCMR 5022

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Ayat Ullah Ex-Police SI Kohat

(Appellant)

VERSUS

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

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 16-01-2020 VIDE OB-NO 33 IN WHICH THE RESPONDENT NO:-3 WITHOUT ANY PROPER ENQUIRY DIRECTLY AWARD THE MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE WITH IMMEDIATE EFFECT AND THE APPELLANT PREFERRED DEPARTMENTAL REPRESENTATION DATED 20-01-2020 BUT THE SAME WAS NOT CONSIDER NOR REJECTED TILL TO DATE.

Respectfully Sheweth,

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

Facts:

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

ii:-As contemplated from report of SP Investigation Kohat ,the gunners of SI Ayat ullah namely constable Abdul Wahab and Muhammad Abid had telephonically contact with charged accused before and after the occurrence.

iii:-it was also reported that the appellant also in contact with the accused on eventful day i.e before and after the occurrence (Copy of Impugned order is annexed as annexure A)

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

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

That an unjust has been done with the appellant by not giving ample opportunity of cross examination as well as not heard in person nor properly enquired the

allegation and ex-parte proceedings conducted against the appellant without probing held guilty the appellant without following the prescribed rules relating to enquiry proceedings as per Police Rules 1975 (amended 2014).

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

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

That the appellant being a responsible officer as well as being SHO always uses tactics for collecting information for the prevention of crimes and also uses different methodology for en robbing the criminals by different ways but this fact was not consider by enquiry officer without obtaining the Forensics audit report held guilty which is against the existing rules ibid.

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

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

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

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

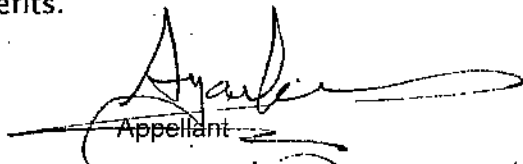
That while awarding the impugned major punishment the enquiry report has not been given to the appellant which is very much necessary as per 1991 PLC CS 706 & PLC 1991 514.

Grounds:

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

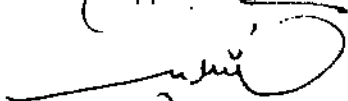
Pray:

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

  
Appellant

Date 24/4/20

Through

  
Syed Mudasir Pirzada  
Advocate HC  
0345-9645854

Certificate:-

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

List of Books

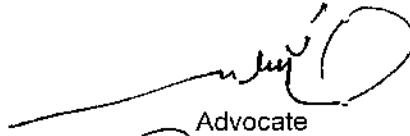
- 1:- Constitution of Pakistan 1973
- 2:- Police Rules
- 3:- Case Law according to need.

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

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

AFFIDAVIT

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

  
Advocate



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BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Ayat Ullah Ex-Police SI Kohat

(Appellant)

VERSUS

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

ADDRESS OF THE PARTIES

APPELLANT :-

Ayat Ullah Ex-Police SI Kohat

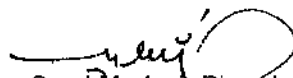
RESPONDENTS

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

  
Appellant

Through

Date 24/4/20

  
Syed Mudasil Pirzada  
Advocate PHC  
0345-9645854

25/3/21

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR

(42)

Service Appeal No. 3325/2020

Ayat Ullah Ex-SI

..... Appellant

**VERSUS**

Inspector General of Police,  
Khyber Pakhtunkhwa & others

..... Respondents

**PARAWISE COMMENTS BY RESPONDENTS.**

**Respectively Sheweth:-**

**Preliminary Objections:-**

- i. That the appellant has got no cause of action.
- ii. That the appellant has got no locus standi.
- iii. That the appeal is not maintainable in its present form.
- iv. That the appeal is bad in law and not maintainable as the appellant has not questioned the order of respondent No 2 vide which the departmental appeal of the appellant was rejected.
- v. That the appellant is estopped to file the instant appeal for his own act.
- vi. That the appellant has not approached the honorable Tribunal with clean hands.
- vii. That the appellant has managed and got out of turn promotion, without joining or qualifying the basic mandatory courses / training required for such promotion. In this regard implementation of the judgments of august Supreme Court of Pakistan is underway and name of appellant is included therein. Copy is **annexure A**.

**Facts:-**

1. On 03.12.2019, one Mst. Fatima Gul Bibi w/r Israr Khan r/o Mohallah Mian Badshah Kohat reported to local Police that one the eventful day at 16:30 hrs her house door was knocked. She opened the door and witnessed that one person wearing Police uniform and face mask, who asked about any male of her family. She informed her son named Ali Israr, who went out and the aforesaid person took away him in a motorcar in context of search of his house. She reported for search of her son, upon which an investigation u/s 156 (iii) CrPC was initiated. The investigation culminated in registration of

FIR vide No. 1592 dated 05.12.2019 u/s 365 PPC PS City Kohat. Copy is **annexure B**.

During course of investigation of the case. SP investigation vide his report dated 24.12.2019 submitted that SHO Ayat Ullah (appellant) and his gunners named constable Abdul Wahab and Muhammad Abid were constantly in contact with the accused subsequently charged in the case. In this regard SP investigation obtained CDR of the accused, which established the telephonic contact of appellant and others. Copy of report is **annexure C**. On the above misconduct of the appellant / involvement in crime was proceeded with departmentally under the relevant rules. During course of inquiry proceedings, the appellant was held guilty of the charge. On completion of all codal formalities he was awarded punishment commensurate to the charges by respondent No. 3.

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

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

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

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

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

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

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

Incorrect, reply is submitted in the above paras.

The departmental appeal of the appellant was processed by respondent No. 2, accordingly, found without merit and rejected vide order dated 25.06.2020. Copy is **annexure D**.

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

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

**Grounds:-**


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


- j. Incorrect, para No. j of the memorandum of appeal is replication and reply is submitted in the above paras.
- k. Incorrect, a legal and speaking order is passed in accordance with the rules.
- l. Incorrect, reply is submitted in the above paras.
- m. Incorrect, reply is submitted in the above paras.

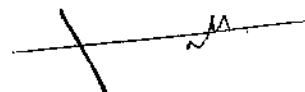
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**Prayer:-**

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

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

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

  
District Police Officer,  
Kohat  
(Respondent No. 3)

(46)

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR



Ayat Ullah Ex-Police SI Kohat

(Appellant)  
Khyber Pakhtoon Khwa Service Tribunal

VERSUS

Diary No. 2653

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

Dated 24/04/2020

(Respondent)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 16-01-2020 VIDE OB-NO 33 IN WHICH THE RESPONDENT NO:-3 WITHOUT ANY PROPER ENQUIRY DIRECTLY AWARD THE MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE WITH IMMEDIATE EFFECT AND THE APPELLANT PREFERRED DEPARTMENTAL REPRESENTATION DATED 20-01-2020 BUT THE SAME WAS NOT CONSIDER NOR REJECTED TILL TO DATE.

Respectfully Sheweth,

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

Facts:

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

ii:-As contemplated from report of SP Investigation Kohat ,the gunners of SI Ayat ullah namely constable Abdul Wahab and Muhammad Abid had telephonically contact with charged accused before and after the occurrence.

iii:-it was also reported that the appellant also in contact with the accused on eventful day i.e before and after the occurrence (Copy of Impugned order is annexed as annexure A)

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

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

That an unjust has been done with the appellant by not giving ample opportunity of cross examination as well as not heard in person nor properly enquired the

EXAMINER  
Khyber Pakhtoon Khwa  
Service Tribunal  
Peshawar  
24/04/2020

ATTESTED  
EXAMINER  
Khyber Pakhtoon Khwa  
Service Tribunal  
Peshawar

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

Service Appeal No.3325/2020

Date of Institution ..... 24.04.2020  
Date of Decision ..... 28.07.2021



Ayat Ullah Ex-Police S.I Kohat.

(Appellant)

**VERSUS**

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

Ashraf Ali Khattak,  
Advocate

... For appellant.

Muhammad Adeel Butt,  
Additional Advocate General

... For respondents.

AHMAD SULTAN TAREEN  
ROZINA REHMAN

... CHAIRMAN  
... MEMBER (J)

**JUDGMENT**

ROZINA REHMAN, MEMBER : Appellant was an S.I in the Police Department. He was dismissed from service on 16.01.2020 It is the legality and validity of this order which has been challenged by him in the present service appeal filed U/S 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.

Handwritten signature and date: 28/7/21

2. The relevant facts leading to the filing of the instant appeal are that complainant of case F.I.R No.1593 dated 05.12.2019 registered at Police Station City Kohat U/S 365 P.P.C reported regarding the kidnapping of his son by a person in Police uniform. The gunners of the appellant allegedly had telephonic contact with the charged accused

ATTESTED  
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Service Tribunal  
Peshawar

before and after the occurrence. The appellant was also suspected for contact with the accused on the eventful day i.e. before and after the occurrence. He was served with charge sheet alongwith statement of allegations, where-after, he submitted reply and after issuance of the final show cause notice, appellant was awarded major punishment of dismissal from service.

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

4. Ashraf Ali Khattak Advocate appearing on behalf of appellant, inter-alia, contends that appellant was not given ample opportunity to defend himself. He was not heard in person and that ex-parte proceedings were initiated against him. He submitted that complainant of the case F.I.R No.1593 recorded statement in a competent court of Law and declared the appellant as innocent but even then, harsh punishment was imposed upon the appellant. He argued that only on the basis of C.D.R, appellant was found guilty but in view of the judgment of the superior fora only on the basis of Mobile Data, no one should be punished. He submitted that while awarding the punishment the inquiry report was never given to the appellant and lastly, he submitted that final show cause notice was issued on 15.01.2020, wherein, the appellant was required to show cause within 7 days of the delivery of the show cause notice but instead of waiting for the reply of the appellant, impugned order was passed by the District Police Office on the very next date i.e. on 16.01.2020. He submitted that reply has

ATTESTED

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar



not been submitted by the appellant to the final show cause notice but even then, a wrong statement was given by the D.P.O in his impugned order regarding the submission of reply by the appellant.

5. Conversely, learned A.A.G submitted that the appellant managed and got out of turn promotion without qualifying mandatory courses and that the entire proceedings were carried out in accordance with law. However, when learned A.A.G was confronted with the final show cause notice, reply to the final show cause notice and the impugned order, he frankly conceded that opportunity had not been afforded to the appellant in view of the available record:

6. In view of the above, without touching other merits of the case, this Bench is of the opinion that consequent upon the completion of inquiry conducted against the appellant he was served with final show cause notice on 15.01.2020 and he was required to show cause in response to the final show cause notice within 7 days of its delivery but on the very next date, i.e. on 16.01.2020, impugned order was passed, whereby major punishment of dismissal from service was imposed upon appellant. It has been mentioned in the impugned order that the appellant was served with final show cause notice, reply was received and found unsatisfactory, whereas, from the record it is crystal clear that appellant was not given proper opportunity and no such reply was submitted by the appellant to the final show cause notice.

7. Keeping in view the above discussion, this appeal is partially accepted and case is remitted to the Department with direction to receive reply of the appellant to the final show cause notice within 7 days of the receipt of this judgment and then to pass a speaking order

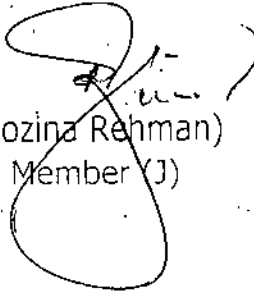
ATTESTED


EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

according to law. Parties are left to bear their own costs. File be  
consigned to the record room.

ANNOUNCED.  
28.07.2021

  
(Ahmad Sultan Tareen)  
Chairman

  
(Rozina Rehman)  
Member (J)

**Certified**  **ture copy**  
**EMANER**  
**Khyber Pakhtunkhwa**  
**Service Tribunal**  
**Peshawar**

Date of Presentation of Application 24-1-2022  
Number 7000  
Case No. 22  
Amount 4  
Total 26  
Date in Original Copy 24-1-2022  
Date in Security of Copy 24-1-2022

Anx - H

(5)



OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT

Tel: 0922-9260116 Fax 9260125

No 189 /PA dated Kohat the 15/12/2019

**FINAL SHOW CAUSE NOTICE**

I, Capt. @ Mansoor Aman, District Police Officer, Kohat as competent authority, under the Khyber Pakhtunkhwa Police Rules 1975, (amended 2014) is hereby serve you, SI Ayat Ullah the then SHO PS Cantt as follow:-

- i. That consequent upon the completion of inquiry conducted against you by the inquiry officer for which you were given opportunity of hearing vide office No. 159025-26/PA dated 27.12.2019.
  - ii. On going, through the finding and recommendations of the inquiry officer, the material on record and other connected papers including your defense before the inquiry officer. I am satisfied that you have committed the following acts/omissions, specified in section 3 of the said ordinance.
    - a. On 03.12.2019, complainant of case FIR No. 1593 dated 05.12.2019 U/S 365 RPC PS City, reported regarding taking of her/his son by a person in Police uniform.
    - b. As contemplated from report of SP Investigation Kohat, your gunners named constable Abdul Wahab and Muhammad Abid had telephonically contact with charged accused before and after occurrence.
    - c. It was also reported that you have also in contact with the accused on the eventful day i.e before and after the occurrence.
2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you major penalty provided under the Rules ibid.
3. You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you also intimate whether you desire to be heard in person.
4. If no reply to this notice is received ~~within 07 days of its delivery~~ in the normal course of circumstances, it shall be presumed that you have no defence to put in and in that case as ex-parte action shall be taken against you.
5. ~~A copy of the finding of inquiry officer is enclosed.~~

DISTRICT POLICE OFFICER,  
KOHAT

Handwritten notes and stamps at the bottom left of the page.

To

Anx - ~~P~~ H

(52)

The District Police Officer,  
District Kohat.

**Subject: REPLY TO FINAL SHOW CAUSE.**

Respected Sir,

In response to the final show cause, I Ayat Ullah Ex-SI, Police Force, Kohat humbly submit as under.

**Allegations**

- a: On 30-12-2019, complainant of case FIR No.1593 dated 05-12-2019 under section 365 PPC PS City, reported regarding taking of her/his son by persons in police uniform.**
- b: As contemplated from report of SP Investigation Kohat, your gunners named Constable Abdul Wahab and Muhammad Abid had telephonically contacted with charged accused before and after occurrence.**
- c: It was also reported that you have also contact with the accused on the eventful day i.e before and after the occurrence.**

**Now Your Honour coming to the accusation/allegation one by one:-**

**Allegation No. "a"**

**On 30-12-2019, complainant of case FIR No.1593 dated 05-12-2019 under section 365 PPC PS City, reported regarding taking of her/his son by persons in police uniform.**

**In this respect, it is humbly submitted**

1. That it is correct that complaint namely Fatima Gul lodged a complaint on 30-12-2019 at PS Saddar, which resulted into lodging of FIR No.1593 dated 05-12-2019 under section 365 PPC, but the complainant neither nominated the me nor my gunner. Detail investigation was carried out. Identification parade was carried out. The undersigned and his gunner/driver were placed before the complainant and her son (alleged victim), but they categorically declared that they are not the person, who were in police uniform at the time of abduction proceedings of the alleged victim. Identification of Vtz car was also carried out. Complaint and her so called abducted son were seated in the Vtz car and were driven through different routs as per demand of complainant and her son. Both of them categorically declared that this was not the car, which was used in the abduction. Case diary dated 28-01-2020 and identification parade dated 17-12-2019 are worth perusal. Prosecution failed to bring an iota of evidence

(53)

against me. My name and the names of gunner are missing in the column of accused.

It is evident from the contents of the FIR that complainant had narrated only apprehension against the nominated accused "Farhad". It is evident from the order dated 10-10-2020 of the Hon'ble Judicial Magistrate-II, Kohat that the nominated accused "Farhad and others" were discharge under section 63 read with section 169 Cr.P.C. Section 169 provide that accused be released from criminal liability, when prosecution has no evidence. Since the prosecution had no evidence therefore the Court was bound to release and discharge the accused and it did so even in the absence of accused as evident from the order of court dated 10-10-2019.

If prosecution has no evidence against the nominated accused than how and under what authority of law; the under signed could be penalized departmentally; when his name is nowhere in the penal of accused?

**Allegation No. "b" and "c"**

- b. As contemplated from report of SP Investigation Kohat, your gunners named Constable Abdul Wahab and Muhammad Abid had telephonically contacted with charged accused before and after occurrence.**
- c. It was also reported that you have also contact with the accused on the eventful day i.e before and after the occurrence.**

In this respect, it is humbly submitted that a detail inquiry was conducted to probe into the alleged allegations, but nothing was bring on record which could connect the under signed with leveled charges.

It is worth mentioning that under signed was charge sheeted on account of report submitted by SP Investigation, Kohat; wherein he charged the undersigned for having cell contact with the nominated accused "Farhad" on the day of alleged occurrence of case FIR No.1593 cited ibid. Nothing more nothing less.

During inquiry proceedings the inquiry officer recorded the statement of (1) Anwar Shah OII (IO of the Criminal Case), (2) Israr Khan S/o Nisar Khan (Husband of the complainant "Fatima Gul Bibi"), (3) Mst: Fatima Gul w/o Israr Khan (Complainant of Criminal case), (4) Muhammad Ali S/o Israr Khan (alleged abductees and son of complainant) and (5) Farhad (alleged nominated accused of the criminal case).

Inquiry Officer failed to bring an iota of incriminating evidence against the undersigned. The statement of witnesses is worth perusal.

Anwar Shah (IO) in his statement has categorically denied the under signed involvement in the occurrence. He has stated in his examination in chief that identification parade of Vtzs Car under the control of Ayat Ullah SHO was carried out, but complainant and her son (alleged abuctee) categorically declare

that it was not the car, which was used in the abduction. Moreover, Ayat Ullah and his gunners were also brought before the complainant and her son, but both of them declared that Ayat Ullah and others are not the persons who participated in the alleged abduction.

The IO (Anwar Shah) was cross examined by the Inquiry Officer but nothing incriminating material was procured. He was put to a question as to whether Constable Abdul Wahab, Muhammad Abid and SHO Ayat Ullah are accused of the offence of FIR No.1593 dated 05-12-2019? The answer was negative. He categorically stated that as per his investigation SHO Ayat Ullah and his gunners are not accused and moreover Vitz Car under the supervision of SHO Ayat Ullah was also not identified by the complainant and her son. The relevant portion of the statement is reproduced as under:-

سوال: کیا آپ نے شروع سے آفریکہ اس مقدمہ کی تفتیش کی ہے؟  
جوانا یہ تمام تفتیشیں نہیں ہو سکی ہیں

سوال: آیا یہ تفتیش کے مطابق کئی کئی عیالوں سے مشعل خریدے اور آپ نے ان کو  
مکرم سے بائیں ہے۔

جواب: میری تفتیش کے مطابق متذکرہ بالا کسوں کے پاس سے کبھی نہ تو کوئی مشعل خریدی  
اور نہ ہی وہ تمام دعوے اور کرائیوں کی آیت اور گواہی کے ساتھ پیش کی گئی اور

Similarly the statement of complainant Mst: Fatima Gul also establishes the innocence of the undersigned. The statement of complainant is worth perusal for the end of justice. She was put to a question by the Inquiry Officer as to whether Ayat Ullah, Abdul Wahab and Muhammad Abid, who are present before you were present during the proceeding of abduction of your son and whether any one or two were present at the time of commission of offence. She categorically denied and said non of them was present at the time of commission of the offence and she has seen them (Ayat Ullah, Abdul Wahab and Muhammad Abid) for the 1<sup>st</sup> time in your office. The relevant portion of the statement is reproduced as under:-

مخبرہ نے  
میں نے  
کون سے  
گواہی سے

Similarly alleged abductee Muhammad Ali was also examined by the Inquiry Officer and cross examined by the him, whereby he also categorically declare that the under signed and his gunners are innocent. He was also put to a question as to whether SI Ayat Ullah Constable Abdul Wahab and Constable

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Muhammad Abid, who are standing before you were the person, who have participated in your abduction? He denied and said non of them were present in alleged abduction process and he can identify the accused if they are brought before him. The relevant portion of the statement is reproduced as under:-

The statement of all witnesses are worth perusal for the end of justice and for the end of procuring and establishing the innocence or other wise of the under signed and his fellow police personals. It is crystal clear from the perusal of whole statements of all witnesses recorded by the inquiry officer that the undersigned and his fellow police constable are not involved in the alleged accusation.

From the bare perusal of the statements recorded by the Inquiry Officer; the under signed cannot be held to be guilty of the alleged charges rather the statement established the innocence of the undersigned.

So far the findings of the inquiry officer are concerned the same is based on surmise and presumption. In presence of direct evidence no adverse presumption can be drawn. Adverse presumption drawn by the Inquiry Officer against the undersigned is against legal norms and justice.

The law in the country is still unchanged and is governed by law of Qanoon-e-Shahadat in Vogue and by virtue of the same, the competent authority has to see, that it is for the prosecution to establish the guilt of the person and if it fails to do so, the result is that benefit goes to the accused of the said failure. It is significant that while referring to civil servant, who is being proceeded against under the Govt: Servant (Efficiency and Discipline) Rules or as the case may be under Police Rules 1975; the word "accused" has been used which indicates that the proceedings conducted by the inquiry officer are akin to a criminal trial [1996 SCMR 127]. A person is presumed to be guilty of misconduct if evidence against him establishes his guilt. The use of the world "guilty" is indicative of the fact that the standard of proof should be akin to one required in criminal cases [ PLD 1983 SC (AJ & K) 95]. In the instant case prosecution has no evidence to establish the alleged allegations against the undersigned rather have been exonerated by witnesses as evident from the statement recorded by the inquiry officer.

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The Inquiry Officer in his finding has only relied upon the alleged CDR, which is no evidence in the eyes of law. The Hon'ble Supreme Court of Pakistan vide reported Judgment 2021 SCMR.522 has held that apart from positive finding of Forensic test, the prosecution has to prove end to end call i.e conversation from both sides and the identification of persons, who made conversions, The wording of the relevant portion of judgment are reproduced as follow:-

***" Evidentiary value and admissibility of CDR.....Mere production of CDR data without transcripts of the calls or end to end audio recording could not be considered/used as evidence worth reliance.....Beside the call transcripts, it should also be established on the record that the callers on the ends were the same person, whose calls data was being used in evidence.....While considering such types of evidence extra care was required to be taken by the courts as advancement of science and technology had also made it very convenient and easy to edit and make changes of one's choice...."***

In the present case no such evidence as per requirement of law laid down by the Hon'ble Supreme Court of Pakistan is available with Inquiry Officer to hold the undersigned as guilty.

It is further humbly submitted that the undersigned is a civil servant/public servant and any citizen can contact him. There is no legal restriction that SHO cannot be contacted through his mob:/ cell number by general public.

It is further humbly submitted that undersigned has remained investigation officer in thousand of criminal cases, he knows the value of mobile contact and has traced numerous culprits on mobile contacts. The question is how a prudent mind can safely presume that a person who has remained a qualified investigating officer can make telephonic contact with a criminal, who is going to commit an offence and that too of abduction. The answer is certainly negative.

In view of the explained humble submission, it is humbly requested that the undersigned may kindly be exonerated from the alleged charges and may be reinstated with all back benefits.



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It is also requested that the undersigned may be provided opportunity of personal hearing.

Ayat Ullah  
Ayat Ullah

Ex-SI,

Police Force, Kohat

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

ANX-1

(58)



Office of the  
District Police Officer,  
Kohat

Ph: #. 0922-9260116 Fax #. 0922-9260125

ORDER

This order is passed in pursuance of judgment dated 28.07.2021 of the Khyber Pakhtunkhwa Service Tribunal, issued in service appeal of **Ex-SI Ayat Ullah** (hereinafter called **delinquent**) vide No. 3325/2020 and approval of the competent authority.

2. In essence, the delinquent was dismissed from service on 16.01.2020, on the score of charges that complainant of case FIR No. 1593 dated 05.12.2019 U/S 365 PPC PS City, reported regarding taking of her son by persons in Police uniform. The gunners of the delinquent (while posted as SHO PS City) have telephonic contacts with the charged accused before and after the occurrence. The delinquent was also suspected for contact with the accused on the eventful day and after that.

3. Feeling aggrieved from the impugned order, the delinquent approached Tribunal in above service appeal after availing the departmental appellate forum, which was partially accepted with the following directions:-

*"Keeping in view of the above discussion, this appeal is partially accepted and case is remitted to the department with direction to receive reply of the appellant to the final show cause notice within 07 days of the receipt of this judgment and then to pass a speaking order according to law".*

4. Hence, in pursuance of above direction, process was initiated against the delinquent, who filed reply to the Final Show Cause Notice. The delinquent is also legitimated opportunity of hearing in orderly room held on 30.08.2021, wherein he explained his position.

5. Record and reply to final show cause notice gone through, which indicates that the complainant did not charge the delinquent and the charged accused in criminal case have been discharged u/s 169 CrPC by the competent court of law, which is no concern with the departmental proceedings. Record further indicates that ex-constables / his gunners had telephonic contacts with the discharged accused on the eventful day and after that, for which they are held guilty / responsible for their own role in separate departmental proceedings conducted against them. Similarly, the said allegation against the delinquent is also suspected, which apparently seems dubious, however, the previous punishment imposed on the appellant was not commensurate to the charges and harsh one.

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6. Therefore, in view of above and in exercise of powers conferred upon me under the Khyber Pakhtunkhwa, Police Rules-1975 (Amended-2014) I, **Sohail Khalid** PSP, District Police Officer, Kohat, by taking a lenient view re-instate in service the delinquent in his substantive rank of SI and impose a minor punishment of stoppage of 03 increments without cumulative effect. The intervening period is treated as unauthorized leave without pay on the principle of "No work, no pay".

Announced  
30.08.2021

  
DISTRICT POLICE OFFICER,  
KOHAT

No 4933-35 PA dated Kohat the 31-08-2021.

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

1. Regional Police Officer Police Kohat, please
2. Reader, Pay Officer, SRC, OHC and Lines officer for necessary action.

ORNO 590

Date, 30-08-21

  
DISTRICT POLICE OFFICER,  
KOHAT

Am J

(60)

To

The Worthy,  
Regional Police Officer,  
Kohat Region, Kohat.

**Subject: Departmental appeal against the impugned order Endst:4933-35/PA dated Kohat the 31-08-2021 of the Worthy District Police Officer, Kohat.**

Respected Sir,

With due respect I have the honour to submit this departmental appeal/representation for your kind consideration and favorable action on the following facts and grounds:

1. That one Mst: Fatima Gul W/O Israr Khan R/o Mohallah Main Badshah, Kohat City on 03-12-3019 reported the local Police that about 16:30 hrs, she was present at her house; that in meanwhile the door of her house was knocked. Upon which she opened the door and found a person in police uniform. She informed her son namely Muhammad Ali, who came out and was then driven away by the person wearing police uniform in a vitz motor car. In the meantime Israr Khan husband of the complainant unfolded that he has got dispute over landed property with one Fahad s/o Nasrullah r/o of Garhi Dodediwal who was not paying Rs.95 lac as sale consideration of the land and threatened for abutment of relationship. He suspected that his son was taken away by him in Police uniform. The report was entered in daily diary No36 dated 3-12-2019 and investigation under section 156(iii) CrPC was initiated. At the time of lodging report victim Muhammad Ali also appeared and stated that two persons in police uniform and two others in civil dress have taken him away in a white motor car. The victim was examined under section 161 and 164 CrPC. The investigation was carried out which culminated into lodging of FIR No.1593 dated 5-12-2019 under section 365 PPC PS city against Farhad s/o Nasrullah and later on, Zubair s/o Muhammad Riaz and Muhammad Qadafi S/o Muhammad Shafique were also arrayed as accused.
2. That as per report of superintendent of police investigation wing Kohat the cell number of the appellant and his gunners namely constable Abdul Wahab and Muhammad Abid had appeared in CDR allegedly of having telephonic contact with suspect accused Farhad before and after the commission of offence.
3. That in the light of Report of Superintendent Investigation, Kohat; appellant and his gunners were charge sheeted with having role in the kidnapping of the son of complainant Mst: Fatima Gul namely Muhammad Ali.
4. That appellant was served with charge sheet and statement of allegation to which he submitted reply and denied the alleged involvement.
5. That inquiry was conducted through SP Operation Kohat (Inquiry Officer), who conducted inquiry.

6. That the worthy DPO, Kohat vide order dated 16-01-2020 dismissed the appellant from his legal service.
7. That appellant being aggrieved from the penal order filed departmental appeal and than service appeal No.3325/2020 before the Khyber Pakhtunkhwa Service Tribunal, Peshawar.
8. That the appeal was disposed of vide order dated 27-07-2021 in the following words:-  
**“Keeping in view the above discussion, this appeal is partially accepted and case is remitted to the department with direction to receive reply of the appellant to the final show cause notice within 07 days of the receipt of this judgment and then to pass a speaking order according to law.”**
9. That in pursuance of the above direction a fresh process was initiated and appellant was required to submit reply to the final show cause, which he submitted according.
10. That vide impugned order Endst:4933-35/PA dated Kohat the 31-08-2021; the worthy DPO imposed upon the appellant minor punishment of stoppage of 03 increments without cumulative effect and that too without mentioning the time period and re-instate the appellant on his substantial post of SI.
11. That appellant now being aggrieved from the impugned order cited ibid prefers the instant departmental appeal on the following grounds amongst others.

**Grounds:**

- A: That appellant has not been treated by the Worth DPO in accordance with law, rules and policy governing the subject and acted in violation of Article, 3, 4 and 10A of the Constitution of Pakistan, 1973. Appellant was neither charged by the accused party nor has I.O of the criminal case procured any evidence which can connect the appellant with alleged accusations mentioned in the charge sheet and statement of allegations. Since there was no evidence against the appellant therefore, he was not made an accused person in criminal case.
- B. That appellant was charged as to the following effects:-

**Allegations:**

- a: **On 30-12-2019, complainant of case FIR No.1593 dated 05-12-2019 under section 365 PPC PS City, reported regarding taking of her/his son by persons in police uniform.**
- b: **As contemplated from report of SP Investigation Kohat, your gunners named Constable Abdul Wahab and Muhammad Abid had telephonically contacted with charged accused before and after occurrence.**
- C: **It was also reported that you have also contact with the accused on the eventful day i.e before and after the occurrence.**

Now your honour coming to the accusations/allegations one by one:-

Allegation No. "a":

- a. **On 30-12-2019, complainant of case FIR No.1593 dated 05-12-2019 under section 365 PPC PS City, reported regarding taking of her/his son by persons in police uniform.**

In this respect, it is humbly submitted;

1. That it is correct that complainant namely Fatima Gul lodged a complaint on 30-12-2019 at PS Saddar, which resulted into lodging of FIR No.1593 dated 05-12-2019 under section 365 PPC, but the complainant neither nominated the appellant nor his gunner. Detail investigation was carried out. Identification parade was carried out. Appellant and his gunner/driver were placed before the complainant and her son (alleged victim), but they categorically declared that they are not the persons, who were in police uniform at the time of abduction proceedings of the alleged victim. Identification of Vtz car was also carried out. Complainant and her so called abducted son were seated in the Vtz car and were driven through different routs as per demand of complainant and her son. Both of them categorically declared that this was not the car, which was used in the abduction. Case diary dated 28-01-2020 and identification parade dated 17-12-2019 are worth perusal. Prosecution failed to bring an iota of evidence against appellant. Appellant and the names of gunners are missing in the column of accused.

It is evident from the contents of the FIR that complainant had narrated only apprehension against the nominated accused "Farhad". It is evident from the order dated 10-10-2020 of the Hon'ble Judicial Magistrate-II, Kohat that the nominated accused "Farhad and others" were discharge under section 63 read with section 169 Cr.P.C. Section 169 provide that accused be released from criminal liability, when prosecution has no evidence. Since the prosecution had no evidence therefore the Court was bound to release and discharge the accused and it did so even in the absence of accused as evident from the order of court dated 10-10-2019.

If prosecution has no evidence against the nominated accused than how and under what authority of law; the under signed could be penalized departmentally; when his name is nowhere in the penal of accused?

Allegation No. "b" and "c":

- b. **As contemplated from report of SP Investigation Kohat, your gunners named Constable Abdul Wahab and Muhammad Abid had telephonically contacted with charged accused before and after occurrence.**
- c. **It was also reported that you have also contact with the accused on the eventful day i.e before and after the occurrence.**

In this respect, it is humbly submitted that a detail inquiry was conducted to probe into the alleged allegations, but nothing was bring on record which could connect the appellant with leveled charges.

It is worth mentioning that appellant was charge sheeted on account of report submitted by SP Investigation, Kohat; wherein he charged the appellant for having cell contact with the nominated accused "Farhad" on the day of alleged occurrence of case FIR No.1593 cited ibid. Nothing more nothing less.

During inquiry proceedings the inquiry officer recorded the statement of (1) Anwar Shah OII (IO of the Criminal Case), (2) Israr Khan S/o Nisar Khan (Husband of the complainant "Fatima Gul Bibi"), (3) Mst: Fatima Gul w/o Israr Khan (Complainant of Criminal case), (4) Muhammad Ali S/o Israr Khan (alleged abductees and son of complainant) and (5) Farhad (alleged nominated accused of the criminal case).

Inquiry Officer failed to bring an iota of incriminating evidence against the undersigned. The statement of witnesses is worth perusal.

Anwar Shah (IO) in his statement has categorically denied the appellant's involvement in the occurrence. He has stated in his examination in chief that identification parade of Vitz Car under the control of Ayat Ullah SHO was carried out, but complainant and her son (alleged abductee) categorically declared that it was not the car, which was used in the alleged abduction. Moreover, Ayat Ullah and his gunners were also brought before the complainant and her son, but both of them declared that Ayat Ullah and others were not the persons who participated in the alleged abduction.

The IO (Anwar Shah) was cross examined by the Inquiry Officer but nothing incriminating material was procured. He was put to a question as to whether Constable Abdul Wahab, Muhammad Abid and SHO Ayat Ullah are accused of the offence of FIR No.1593 dated 05-12-2019. The answer was negative. He categorically stated that as per his investigation SHO Ayat Ullah and his gunners are not accused and moreover Vitz Car under the supervision of SHO Ayat Ullah was also not identified by the complainant and her son.

Similarly the statement of complainant Mst: Fatima Gul also establishes the innocence of the appellant. The statement of complainant is worth perusal for the end of justice. She was put to a question by the Inquiry Officer as to whether Ayat Ullah, Abdul Wahab and Muhammad Abid, who are present before you were present during the proceeding of abduction of your son and whether any one or two were present at the time of commission of offence. She categorically denied and said that none of them was present at the time of commission of the offence and she has seen them (Ayat Ullah, Abdul Wahab and Muhammad Abid) for the 1<sup>st</sup> time in your office.

Similarly alleged abductee Muhammad Ali was also examined by the Inquiry Officer and cross examined by the him, whereby he also categorically declare that the appellant and his gunners are innocent. He was also put to a question as to whether SI Ayat Ullah, Constable Abdul Wahab and Constable Muhammad Abid, who are standing before you, were the person, who have participated in your abduction? He denied and said none of them were present in alleged abduction process and he can identify the accused if they are brought before him.

The statement of all witnesses are worth perusal for the end of justice and for the end of procuring and establishing the innocence or other wise of the appellant and his fellow police personals. It is crystal clear from the perusal of whole statements of all witnesses recorded by the inquiry officer that the undersigned and his fellow police constable are not involved in the alleged accusation.

From the bare perusal of the statements recorded by the Inquiry Officer; the appellant cannot be held to be guilty of the alleged charges rather the statement established the innocence of the appellant.

So far the findings of the inquiry officer are concerned the same is based on surmise and presumption. In presence of direct evidence no adverse presumption can be drawn. Adverse presumption drawn by the Inquiry Officer against the appellant is against legal norms and justice.

The law in the country is still unchanged and is governed by law of Qanoon-e-Shahadat in Vogue and by virtue of the same, the competent authority has to see, that it is for the prosecution to establish the guilt of the person and if it fails to do so, the result is that benefit goes to the accused of the said failure. It is significant that while referring to civil servant, who is being proceeded against under the Govt: Servant (Efficiency and Discipline) Rules or as the case may be under Police Rules 1975; the word "accused" has been used which indicates that the proceedings conducted by the inquiry officer are akin to a criminal trial [1996 SCMR 127]. A person is presumed to be guilty of misconduct if evidence against him establishes his guilt. The use of the world "guilty" is indicative of the fact that the standard of proof should be akin to one required in criminal cases [ PLD 1983 SC (AJ & K) 95]. In the instant case prosecution has no evidence to establish the alleged allegations against the undersigned rather have been exonerated by witnesses as evident from the statement recorded by the inquiry officer.

The Inquiry Officer in his finding has only relied upon the alleged CDR, which is no evidence in the eyes of law. The Hon'ble Supreme Court of Pakistan vide reported Judgment 2021 SCMR 522 has held that apart from positive finding of Forensic test, the prosecution has to prove end to end call i.e conversation from both sides and the identification of persons, who made conversions, The wording of the relevant portion of judgment are reproduced as follow:-

*" Evidentiary value and admissibility of CDR.....Mere production of CDR data without transcripts of the calls or end to end audio recording could not be considered/used as evidence worth reliance.....Beside the call transcripts, it should also be established on the record that the callers on the ends were the same person, whose calls data was being used in evidence.....While considering such types of evidence extra care was required to be taken by the courts as advancement of science and technology had also made it very convenient and easy to edit and make changes of one's choice...."*



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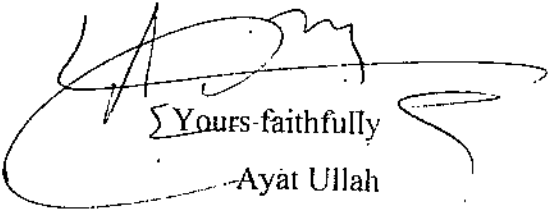
In the present case no such evidence as per requirement of law as laid down by the Hon'ble Supreme Court of Pakistan is available with Inquiry Officer to hold the appellant as guilty.

It is further humbly submitted that the appellant is a civil servant/public servant and any citizen can contact him. There is no legal restriction that SHO cannot be contacted through his mob:/ cell number by general public.

It is further humbly submitted that appellant has remained investigation officer in thousand of criminal cases; he knows the value of mobile contact and has traced numerous culprits on mobile contacts. The question is how a prudent mind can safely presume that a person who has remained a qualified investigating officer can make telephonic contact with a criminal, who is going to commit an offence and that too of abduction. The answer is certainly negative.

In view of the explained humble submission, it is humbly requested that the undersigned may kindly be exonerated from the alleged charges and may be re-instated with all back benefits.

It is also requested that the undersigned may be provided opportunity of personal hearing to defend him from all allegations.

  
Yours faithfully  
Ayat Ullah  
Police Force, Kohat.

Dated: 26-109/2021

ANX 1

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POLICE DEPTT.

KOHAT REGION


ORDER.

This order will dispose of a departmental appeal, moved by S.I Ayat Ullah No. K/30 of Kohat district against the punishment order, passed by DPO Kohat vide OB No. 590. dated 30.08.2021 whereby he was awarded minor punishment of stoppage of three increment without accumulative effect and intervening period was treated as unauthorized leave without pay on the principal of "no work no pay" on the allegations while posted as SHO PS City a case vide FIR No.1593 dated 15.12.2019 U/S 365 PPC was registered in P.S City. During the course of investigation S.P Investigation, Kohat vide his Report No. 4640/Reader dated 24.12.2019 intimated that the appellant and his gunner had in contact with accused and his CDR was obtained in this regard. Complaints of the said FIR reported regarding taking of her son by a person in Police uniform. It has also been reported that he had in contact with the accused on the eventful day i.e before and after the occurrence.

He preferred an appeal to the undersigned, upon which comments were obtained from DPO Kohat and his service record was perused. The appellant was also called and heard in person in Orderly Room held in this office on 23.11.2021. During hearing, the appellant did not produce any plausible explanation in his defense to prove his innocence.

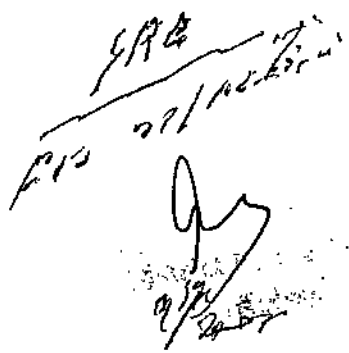
I have gone through the available record and came to the conclusion that the allegations leveled against the appellant are proved. Therefore, in exercise of the powers conferred upon the undersigned, his appeal being devoid of merits is hereby rejected.


Order Announced  
30.11.2021

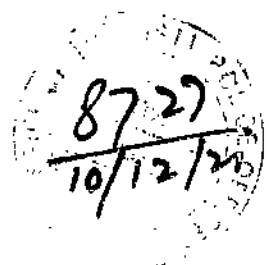
  
(TAHIR AYUB) PSP  
Region Police Officer,  
Kohat Region.

No. 19063 /EC, dated Kohat the 1-12- /2021.

Copy for information and necessary action to the District Police Officer, Kohat w/r to his office Memo: No.14002/LB, dated 11.11.2021. His Fauji Missal is returned herewith.



  
(TAHIR AYUB) PSP  
Region Police Officer,  
Kohat Region.



Anx- R114

# رپورٹ ضمنی

(9)

ضلع کوہاٹ

25 مئی 1953

تھانہ سی

ابتدائی اطلاقی رپورٹ نمبر 1593

تاریخ و مقام وقوع 5.12.51

PP. 365

تھانہ میں موصول ہونے کا وقت و تاریخ

تھانہ سے روانگی کا وقت و تاریخ

تھانہ میں موصول ہونے کا وقت و تاریخ	تھانہ سے روانگی کا وقت و تاریخ	مقام	رپورٹ کا نمبر و تاریخ	پرمیٹنگ آفیسر کا نام
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میزریم، سماہ، حافظ علی بی بی، بزم اسرار کے قلم حیاں ماہرہ، کلاں  
 نام، دربار خان، دربار خان کے قلم حیاں، کلاں، دربار خان  
 2. زینب، زینب، زینب، زینب  
 3. محمد قرائی، محمد قرائی، محمد قرائی

عائشہ کی حالت صدمہ شدید ہے جس کے نتیجے میں اس کی  
 کے بچانے کی کوششیں ہو رہی ہیں۔ لڑکی کو کلاں میں رکھا گیا ہے اور وہ  
 اب تک اس کے ساتھ ہی ہے۔ اس کی طبیعت اب تک  
 نہیں بدلتی ہے۔ اس کی حالت صدمہ ہے۔ اور اس کی کسی شے سے  
 صدمہ میں حیاں کے والدین کو اس کے بارے میں ضروری سمجھا کر  
 کے واقعہ اس کے والدین کو بتا دیا گیا ہے۔ ان کے پاس  
 ساری باتوں کو سمجھا کر ان کی رنجشوں کو دور کرنے کے لیے  
 محنت کا کام ہے۔ اس کے ساتھ ہی اس کے والدین کو بھی  
 اس کے بارے میں بتا دیا گیا ہے۔ اس کے والدین کو بھی  
 اس کے بارے میں بتا دیا گیا ہے۔ اس کے والدین کو بھی  
 اس کے بارے میں بتا دیا گیا ہے۔ اس کے والدین کو بھی

28  
20

4:30 بجے

5:40 بجے

A

28-1  
20

مباح و حرام

مستخرج من كتاب...

الاستعمال في...

الاستعمال في...

الاستعمال في...

الاستعمال في...

الاستعمال في...

الاستعمال في...

الاستعمال في...

FORM OF ORDER SHEET  
IN THE COURT OF MUHAMMAD WAQAR, JUDICIAL MAGISTRATE-II, KOHAT

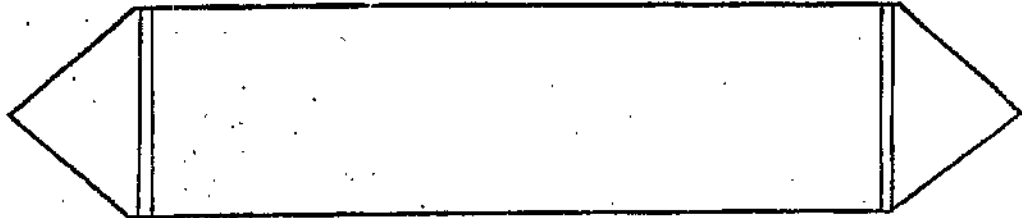
Serial No. of Order of Proceedings	Date of order or Proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties or counsel where necessary
<p>ORDER-1</p> <p>10.10.2020</p> <p>365-PP-125-13-2019</p> <p>14/10/20</p>		<p>FIR No.1593 dated 05.12.2019 u/s 365 PPC PS City State vs. Farhad etc..</p> <ol style="list-style-type: none"> <li>1. Complete challan alongwith an application for discharge of accused submitted by prosecution.</li> <li>2. APP for state present. Accused are absent. Arguments of APP heard. Record perused.</li> <li>3. Perusal of record reveals that no solid and cogent evidence against the accused, which shows that involvement of accused.</li> <li>4. Prosecution has not associated any private witness to the spot. That accused have been charged by the local police and not the by the complainant. That the complainant recorded her statement under section 164 Cr.PC that she did not want to charge anyone for eh commission of offence. That identification has not been conducted in the instant case. Lastly, all accused have satisfied the complainant regarding their innocence.</li> <li>5. There is no probability of conviction of accused in the instant case on the basis of available evidence. The trial of the instant case will be a futile exercise / wastage of precious time of the court.</li> <li>6. Keeping in view, above discussion, accused are hereby discharged in absentia by exercising the jurisdiction U/S 63 read with section 169 Cr.P.C.</li> <li>7. Case properly be dealt in accordance with law.</li> <li>8. Police file be returned to police. File of this court be consigned to record room after completion</li> </ol> <p>Muhammad Waqar Judicial Magistrate II Kohat</p> <p>Muhammad Waqar Judicial Magistrate-II, Kohat</p>

Handwritten notes on the left margin, including '365-PP-125-13-2019' and other illegible scribbles.

Handwritten signature and date '14/10/20' at the bottom left of the table.

Handwritten signature and date '14/10/20' at the bottom right of the table, overlapping the printed signature.

# بعدالت سدوسن لٹریچر کی کاپی



اسات الکا بنام حکومت

موزخہ
مقدمہ
دعویٰ
جرم

## باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ اسات

آن مقام لسکڑ کیلئے اسات کے لئے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقریرتالیف، فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقریر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائنا التوائے مقدمہ کے سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

Accepted by  
 12/11/2021  
 المرقوم 30

واہ العباد

بمقام لٹریچر کے لئے منظور ہے۔

Atul kumar

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 205/2022  
Ayat Ullah  
SI, District Kohat

..... Appellant

**VERSUS**

Regional Police Officer,  
Kohat & other

..... Respondents

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S #	Description of documents	Annexure	pages
1.	Parawise comments.	-	01-03
2.	Affidavit	-	04
3.	Copy of CDR	A	05-09.
4.	Copies of conditionally re-instatement orders of co-accused of appellant	B & B-1	10
5.	Authority letter	-	12

Repy  
Deponent

P-1

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

---

Service Appeal No. 205/2022

Ayat Ullah  
SI, District Kohat

..... Appellant

**VERSUS**

Regional Police Officer,  
Kohat & other

..... Respondents

**PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO 1 & 2.**

**Respectfully Sheweth:-**  
**Preliminary Objections:-**

- i. That the appellant has got no cause of action to file the instant appeal.
- ii. The appellant has got no locus standi to file the instant appeal.
- iii. That the appeal is bad for misjoinder and nonjoinder of necessary parties.
- iv. That the appellant is estopped to file the instant appeal for his own act.
- v. That the appeal is bad in eyes of law and not maintainable.
- vi. That the appellant has not approached the honorable Tribunal with clean hands.
- vii. That the appeal of the appellant is badly based by law & limitation.

**Facts:-**

1. Para No. 1 of the appeal pertains to service record of the appellant.
2. The appellant was proceeded with departmentally on his own conduct / grave professional misconduct, which earned a bad name to the disciplined Police department.

**Brief History**

3. Pertains to record.
4. Correct, during the course of investigation / inquiry u/s 156 (iii) CrPC, Superintendent of Police, Investigation Kohat ascertained contacts of cellular calls of appellant and his gunners with suspect and accused. The conduct of the appellant through his gunners established link of the appellant with the suspect / accused and amounted to his involvement in a criminal act. Copy of CDR is **annexure A.**
5. Correct, the appellant and other officials were held for the commission of offence and departmental proceedings were initiated against them by respondent No. 2.
6. Correct, to the extent of issuance and serving of charge sheet alongwith statement of allegation to the appellant by respondent No. 2, however, the reply filed by the appellant was found unsatisfactory and without cogent reason.



7. Correct, that Superintendent of Police, Operations Kohat was appointed as inquiry officer, who proceeded against the appellant in accordance with the relevant rules and followed all codal formalities provided under the rules. On conclusion SP Investigation / Inquiry officer submitted final report inquiry report to respondent No. 2.
8. As per report of inquiry officer and available record / evidence collected during the course of inquiry the charges / allegations leveled against the appellant were established beyond any shadow of doubt. Therefore, the respondent No. 2 on exercise of powers conferred upon him and fulfilling codal formalities passed the dismissal from service order against the appellant.
9. Pertains to service appeal No. 3225/2020 and judgment / order passed by Honorable Service Tribunal vide order dated 28.07.2021 on the aforesaid service appeal of the appellant.
10. In compliance with the direction of Honorable Tribunal, the respondent No. 2 issued final show cause notice to the appellant to which the appellant filed reply, but found unsatisfactory.
11. The appellant was held guilty of the charges. Therefore, the respondent No. 2 while taking a lenient view reinstated the appellant in service and imposed a minor punishment of stoppage of 03 increments without cumulative effect and the intervening period was treated as unauthorized leave without pay on the principle of "No work no pay" vide order dated 30.08.2021.
12. The departmental appeal of the appellant was devoid of merits was correctly rejected by respondent No. 1. It is added that the appellant was provided ample opportunity of personal hearing during orderly room held on 23.11.2021, but he failed to advance any plausible explanation to the charges established against him.

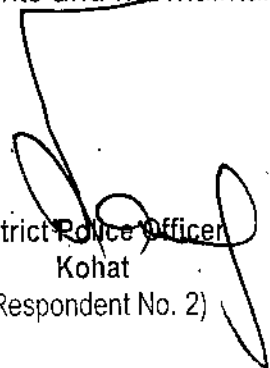
**Grounds:-**


- A. Incorrect, the appellant had committed a gross professional misconduct, which earned bad name to the department therefore, the appellant was liable to be proceeded with departmentally under the relevant rules. Thus the appellant was treated in accordance with the rules.
- B. The charges / allegations, pertains to charge sheet and statement of allegations. However, it is worth mentioning that the charges / allegations leveled against the appellant have been established through a speaking order of respondent No. 2, beyond any shadow of doubt. Thus the stance advanced by appellant in sub paras of para-B are irrelevant as, the appellant repeated / reproduced facts / circumstances of a criminal case vide FIR No. 1593/2019 and evidence of departmental inquiry.

- C. Incorrect, the appellant was proceeded with departmentally under the Khyber Pakhtunkhwa, Police Rules-1975 (amended-2014) and followed by respondent No. 2 while disposing of departmental inquiry against the appellant. It is also added that the respondent, No. 2 being a competent authority had properly evaluated the inquiry report and material / evidence available on record.
- D. The gunners of appellant / co-accused have been re-instated in service in compliance with order of this Honorable Tribunal in execution petitions. The co accused have been reinstated provisionally subject to outcome of CPLA filed against the impugned judgment in Supreme Court of Pakistan. Copies are **annexure B & B-1**.
- E. Incorrect, the appellant was associated with the inquiry proceedings, heard in person in orderly room by the respondents and afforded ample opportunity of defense but the appellant failed to advance any plausible explanation to the charges established against him.
- F. Incorrect, as replied in para E, the appellant was provided an opportunity of defense and personal hearing.
- G. Incorrect, reply submitted in the above paras.
- H. The appellant is member of a disciplined department who committed a grave professional misconduct which has been established against him beyond any shadow of doubt during departmental inquiry conducted under the relevant rules.
- I. The respondent No. 2 being competent authority re-instated the appellant and awarded a minor punishment and intervening period was treated as unauthorized leave without pay on the principal of no work no pay.
- J. As the appellant is has guilty of the charges remained out of service for his own conduct. Therefore, the appellant is not entitled for any kind of back benefits. In addition the appellant has not filed any affidavit regarding his jobless during the intervening period.
- K. Incorrect, the impugned orders are legal, speaking and passed by respondents, after fulfilling all codal formalities.
- L. The respondents may also be allowed to advance other grounds during the course of arguments.

**Prayer:-**

In view of the above, it is prayed that the appeal contrary to facts, law & rules, devoid of merits and not maintainable may graciously be dismissed with costs.

  
 District Police Officer  
 Kohat  
 (Respondent No. 2)

  
 Regional Police Officer,  
 Kohat  
 (Respondent No. 1)

P-4

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

---

Service Appeal No. 205/2022

**Ayat Ullah**  
SI, District Kohat

..... Appellant

**VERSUS**

Regional Police Officer,  
Kohat & other

..... Respondents

**COUNTER AFFIDAVIT**

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

  
District Police Officer,  
Kohat  
(Respondent No. 2)

  
Regional Police Officer,  
Kohat  
(Respondent No. 1)

IMEI	A Number	B Number	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
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357171099164470	923339634123	923465655630	19/07/2019 8:53	19/07/2019 8:54	102	INCOMING	VOICE	KUST Chowk - KOHAT
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357171099164470	923339634123	923215771638	19/07/2019 12:07	19/07/2019 12:08	24	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923335994819	19/07/2019 12:25	19/07/2019 12:25	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923335994819	19/07/2019 12:27	19/07/2019 12:27	60	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	19/07/2019 12:35	19/07/2019 12:36	28	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9233703008671	19/07/2019 12:39	19/07/2019 12:40	10	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923335994819	19/07/2019 12:41	19/07/2019 12:41	87	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923306790798	19/07/2019 12:50	19/07/2019 12:52	133	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923306790798	19/07/2019 12:52	19/07/2019 12:54	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	9233703008671	19/07/2019 13:08	19/07/2019 13:08	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923215771638	19/07/2019 13:18	19/07/2019 13:18	108	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	19/07/2019 13:30	19/07/2019 13:30	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	19/07/2019 13:31	19/07/2019 13:31	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	19/07/2019 13:31	19/07/2019 13:31	54	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	19/07/2019 13:51	19/07/2019 13:52	163	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	19/07/2019 13:55	19/07/2019 13:58	18	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	19/07/2019 14:03	19/07/2019 14:04	79	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	19/07/2019 14:14	19/07/2019 14:15	17	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	19/07/2019 14:16	19/07/2019 14:16	0	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	19/07/2019 14:17	19/07/2019 14:17	17	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923018500101	19/07/2019 14:21	19/07/2019 14:21	125	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	19/07/2019 14:24	19/07/2019 14:26	572	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	19/07/2019 14:32	19/07/2019 14:41	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	19/07/2019 16:47	19/07/2019 16:47	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	19/07/2019 16:48	19/07/2019 16:48	0	INCOMING	SMS	KUST Chowk - KOHAT

(Signature)

Amoriz - A  
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IMEI	IA Number	IS Number	Call Start Time	Call End Time	Call Duration	Call Type	Service	Location
357171099164470	923339634123	923333008671	19/07/2019 16:48	19/07/2019 16:49	27	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923018500101	19/07/2019 16:50	19/07/2019 16:52	151	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923333008671	19/07/2019 17:06	19/07/2019 17:06	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923335110000	19/07/2019 17:11	19/07/2019 17:13	128	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923335110000	19/07/2019 17:13	19/07/2019 17:14	79	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923335110000	19/07/2019 17:15	19/07/2019 17:16	70	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923335110000	19/07/2019 17:16	19/07/2019 17:18	129	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923333008671	19/07/2019 17:16	19/07/2019 17:16	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923335110000	19/07/2019 17:19	19/07/2019 17:23	271	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923334947766	19/07/2019 17:21	19/07/2019 17:21	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923306790798	19/07/2019 17:23	19/07/2019 17:24	28	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339615588	19/07/2019 17:35	19/07/2019 17:35	17	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923329625122	19/07/2019 17:42	19/07/2019 17:42	24	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	92334947766	19/07/2019 17:46	19/07/2019 17:47	20	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	92334947766	19/07/2019 18:06	19/07/2019 18:06	19	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339628139	19/07/2019 18:08	19/07/2019 18:08	38	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923333008671	19/07/2019 18:17	19/07/2019 18:17	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923339625368	19/07/2019 18:32	19/07/2019 18:33	24	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923364040509	19/07/2019 18:39	19/07/2019 18:39	13	INCOMING	VOICE	Babi Zai - KOHAT
357171099164470	923339634123	923348402597	19/07/2019 18:48	19/07/2019 18:49	30	INCOMING	VOICE	Adda Jahal Shahkot FSD Rd - BABI ZAI
357171099164470	923339634123	923364040509	19/07/2019 18:56	19/07/2019 18:56	6	INCOMING	VOICE	Jarma - JARMA
357171099164470	923339634123	923339648550	19/07/2019 19:09	19/07/2019 19:09	38	OUTGOING	VOICE	Babi Zai - KOHAT
357171099164470	923339634123	923338478550	19/07/2019 19:10	19/07/2019 19:11	35	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923018016261	19/07/2019 19:16	19/07/2019 19:16	24	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923369616438	19/07/2019 19:18	19/07/2019 19:18	21	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923315389952	19/07/2019 19:21	19/07/2019 19:21	19	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923339664434	19/07/2019 19:25	19/07/2019 19:25	13	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923369616438	19/07/2019 19:28	19/07/2019 19:28	6	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923355565550	19/07/2019 19:30	19/07/2019 19:30	19	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9229260131	19/07/2019 19:36	19/07/2019 19:36	79	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923336164158	19/07/2019 19:36	19/07/2019 19:36	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	92336164158	19/07/2019 19:36	19/07/2019 19:37	38	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923364040509	19/07/2019 19:40	19/07/2019 19:40	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923335110000	19/07/2019 19:41	19/07/2019 19:42	109	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923335110000	19/07/2019 19:43	19/07/2019 19:44	71	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923335110000	19/07/2019 19:44	19/07/2019 19:48	245	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339869859	19/07/2019 19:56	19/07/2019 19:58	74	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923335994819	19/07/2019 20:04	19/07/2019 20:05	42	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923366088041	19/07/2019 20:07	19/07/2019 20:07	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923366088041	19/07/2019 20:08	19/07/2019 20:08	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923366088041	19/07/2019 20:08	19/07/2019 20:08	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923339606183	19/07/2019 20:25	19/07/2019 20:25	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923331596465	19/07/2019 20:31	19/07/2019 20:32	70	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923331596465	19/07/2019 20:34	19/07/2019 20:35	41	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923441414106	19/07/2019 20:35	19/07/2019 20:36	64	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9229260205	19/07/2019 20:41	19/07/2019 20:41	27	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339631104	19/07/2019 20:41	19/07/2019 20:41	14	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923331596465	19/07/2019 20:57	19/07/2019 20:58	49	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923322818333	19/07/2019 20:58	19/07/2019 20:59	33	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339869859	19/07/2019 21:00	19/07/2019 21:00	45	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923369616467	19/07/2019 21:04	19/07/2019 21:04	7	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339664434	19/07/2019 21:06	19/07/2019 21:06	73	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	92317790100	19/07/2019 21:07	19/07/2019 21:08	46	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923331596465	19/07/2019 21:15	19/07/2019 21:16	10	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	922554057	19/07/2019 21:17	19/07/2019 21:17	86	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	922554057	19/07/2019 21:20	19/07/2019 21:21	6	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339664434	19/07/2019 21:33	19/07/2019 21:33	57	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339611111	19/07/2019 21:36	19/07/2019 21:37	21	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923306790798	19/07/2019 22:21	19/07/2019 22:21	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923339626960	19/07/2019 22:49	19/07/2019 22:49	55	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9229260131	19/07/2019 22:55	19/07/2019 22:56				

IMEI	A Number	B Number	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
357171099164470	923339634123	923348253141	20/07/2019 7:27	20/07/2019 7:27	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923348253141	20/07/2019 7:27	20/07/2019 7:27	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	20/07/2019 7:32	20/07/2019 7:32	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	922866153	20/07/2019 7:37	20/07/2019 7:38	58	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9229260205	20/07/2019 7:43	20/07/2019 7:43	46	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9229260131	20/07/2019 7:48	20/07/2019 7:48	13	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9229260131	20/07/2019 7:56	20/07/2019 7:57	25	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339629833	20/07/2019 8:05	20/07/2019 8:05	32	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923369914511	20/07/2019 8:13	20/07/2019 8:13	26	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923078002837	20/07/2019 8:15	20/07/2019 8:15	43	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923089029425	20/07/2019 8:25	20/07/2019 8:26	32	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923306790798	20/07/2019 8:30	20/07/2019 8:31	10	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339644460	20/07/2019 8:35	20/07/2019 8:36	29	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923306790798	20/07/2019 8:46	20/07/2019 8:46	0	INCOMING	SMS	Babi Zai - KOHAT
357171099164470	923339634123	9233258333665	20/07/2019 8:50	20/07/2019 8:51	81	OUTGOING	VOICE	Babi Zai - KOHAT
357171099164470	923339634123	923379222111	20/07/2019 8:52	20/07/2019 8:52	22	INCOMING	VOICE	Babi Zai - KOHAT
357171099164470	923339634123	9234196259577	20/07/2019 8:55	20/07/2019 8:55	15	INCOMING	VOICE	Adda Johal Shahkot FSD Rd - BABI ZAI
357171099164470	923339634123	923329625122	20/07/2019 9:02	20/07/2019 9:03	16	INCOMING	VOICE	Adda Johal Shahkot FSD Rd - BABI ZAI
357171099164470	923339634123	923349958821	20/07/2019 9:10	20/07/2019 9:10	11	OUTGOING	VOICE	Babi Zai - KOHAT
357171099164470	923339634123	923339625655	20/07/2019 9:11	20/07/2019 9:11	0	INCOMING	SMS	Babi Zai - KOHAT
357171099164470	923339634123	9233258333665	20/07/2019 9:14	20/07/2019 9:14	17	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339626356	20/07/2019 9:29	20/07/2019 9:29	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	9229260131	20/07/2019 9:31	20/07/2019 9:31	11	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339627668	20/07/2019 9:38	20/07/2019 9:38	0	INCOMING	SMS	Babi Zai - BABI ZAI
357171099164470	923339634123	923339688569	20/07/2019 9:57	20/07/2019 9:57	24	INCOMING	VOICE	Adda Johal Shahkot FSD Rd - BABI ZAI
357171099164470	923339634123	9233384788550	20/07/2019 9:59	20/07/2019 9:59	24	INCOMING	VOICE	Adda Johal Shahkot FSD Rd - BABI ZAI
357171099164470	923339634123	92333293297	20/07/2019 10:02	20/07/2019 10:02	39	INCOMING	VOICE	Adda Johal Shahkot FSD Rd - BABI ZAI
357171099164470	923339634123	923339661997	20/07/2019 10:06	20/07/2019 10:07	39	INCOMING	VOICE	Adda Johal Shahkot FSD Rd - BABI ZAI
357171099164470	923339634123	923339644460	20/07/2019 10:19	20/07/2019 10:20	37	INCOMING	VOICE	Adda Johal Shahkot FSD Rd - BABI ZAI
357171099164470	923339634123	923345581845	20/07/2019 10:20	20/07/2019 10:20	18	INCOMING	VOICE	Adda Johal Shahkot FSD Rd - BABI ZAI
357171099164470	923339634123	923339644460	20/07/2019 10:21	20/07/2019 10:21	14	OUTGOING	VOICE	Adda Johal Shahkot FSD Rd - BABI ZAI
357171099164470	923339634123	9233384788550	20/07/2019 10:24	20/07/2019 10:25	60	OUTGOING	VOICE	Adda Johal Shahkot FSD Rd - BABI ZAI
357171099164470	923339634123	923345581845	20/07/2019 10:26	20/07/2019 10:26	48	OUTGOING	VOICE	Babi Zai - KOHAT
357171099164470	923339634123	923339631104	20/07/2019 10:27	20/07/2019 10:27	16	OUTGOING	VOICE	Babi Zai - KOHAT
357171099164470	923339634123	923349958821	20/07/2019 10:29	20/07/2019 10:30	58	OUTGOING	VOICE	Babi Zai - KOHAT
357171099164470	923339634123	923348296166	20/07/2019 10:30	20/07/2019 10:30	29	INCOMING	VOICE	Babi Zai - KOHAT
357171099164470	923339634123	923348296166	20/07/2019 10:32	20/07/2019 10:32	24	INCOMING	VOICE	Babi Zai - KOHAT
357171099164470	923339634123	923313567317	20/07/2019 10:33	20/07/2019 10:33	33	OUTGOING	VOICE	Babi Zai - KOHAT
357171099164470	923339634123	923339644460	20/07/2019 10:33	20/07/2019 10:33	18	OUTGOING	VOICE	Babi Zai - KOHAT
357171099164470	923339634123	923339644460	20/07/2019 10:37	20/07/2019 10:38	11	INCOMING	VOICE	Adda Johal Shahkot FSD Rd - BABI ZAI
357171099164470	923339634123	923325960867	20/07/2019 10:39	20/07/2019 10:40	15	OUTGOING	VOICE	Toeh Bala - KOHAT
357171099164470	923339634123	923339657573	20/07/2019 10:42	20/07/2019 10:43	37	INCOMING	VOICE	Adda Johal Shahkot FSD Rd - BABI ZAI
357171099164470	923339634123	923306720820	20/07/2019 11:12	20/07/2019 11:12	25	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339637709	20/07/2019 11:17	20/07/2019 11:18	19	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339631104	20/07/2019 11:28	20/07/2019 11:28	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923313567317	20/07/2019 11:33	20/07/2019 11:33	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923339664434	20/07/2019 11:33	20/07/2019 11:33	11	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923329626535	20/07/2019 11:33	20/07/2019 11:34	35	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923349958821	20/07/2019 11:34	20/07/2019 11:34	12	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923441414106	20/07/2019 11:34	20/07/2019 11:34	24	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923379222111	20/07/2019 11:45	20/07/2019 11:45	0	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923349958821	20/07/2019 11:47	20/07/2019 11:47	2	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923339646280	20/07/2019 11:47	20/07/2019 11:48	37	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923333293297	20/07/2019 11:48	20/07/2019 11:48	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923369650525	20/07/2019 11:48	20/07/2019 11:48	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923369650525	20/07/2019 11:49	20/07/2019 11:49	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923318355005	20/07/2019 11:49	20/07/2019 11:49	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923318355005	20/07/2019 11:49	20/07/2019 11:49	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923318355005	20/07/2019 11:50	20/07/2019 11:50	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923318355005	20/07/2019 11:50	20/07/2019 11:50	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923318355005	20/07/2019 11:51	20/07/2019 11:52	61	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923349958821	20/07/2019 11:51	20/07/2019 11:51	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923349977766	20/07/2019 11:52	20/07/2019 11:52	20	INCOMING	VOICE	KUST Chowk - KOHAT

(7)





MSISDN	PA NUMBER	IR NUMBER	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
357171099164470	923339634123	9229260130	20/07/2019 19:02	20/07/2019 19:03	17	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9229260130	20/07/2019 19:30	20/07/2019 19:31	55	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 19:32	20/07/2019 19:33	5	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9233331333300	20/07/2019 19:51	20/07/2019 19:51	0	OUTGOING	SMS	JARMA - JARMA
357171099164470	923339634123	923339634123	20/07/2019 19:51	20/07/2019 19:52	50	INCOMING	VOICE	JARMA - JARMA
357171099164470	923339634123	923349958821	20/07/2019 19:53	20/07/2019 19:53	14	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923331596465	20/07/2019 19:54	20/07/2019 19:54	22	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923333333300	20/07/2019 19:56	20/07/2019 19:56	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	9229260201	20/07/2019 20:01	20/07/2019 20:01	16	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 20:02	20/07/2019 20:02	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 20:02	20/07/2019 20:02	0	OUTGOING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923349215054	20/07/2019 20:03	20/07/2019 20:07	223	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 20:03	20/07/2019 20:03	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 20:07	20/07/2019 20:07	0	OUTGOING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 20:08	20/07/2019 20:08	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923360997549	20/07/2019 20:09	20/07/2019 20:09	0	OUTGOING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923360997549	20/07/2019 20:09	20/07/2019 20:09	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 20:09	20/07/2019 20:09	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923331333300	20/07/2019 20:10	20/07/2019 20:10	0	OUTGOING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923331333300	20/07/2019 20:13	20/07/2019 20:13	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923306790798	20/07/2019 20:19	20/07/2019 20:20	31	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 20:21	20/07/2019 20:21	0	OUTGOING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923364000509	20/07/2019 20:22	20/07/2019 20:25	188	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923372818333	20/07/2019 20:33	20/07/2019 20:34	18	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	20/07/2019 20:43	20/07/2019 20:44	33	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9229260131	20/07/2019 20:46	20/07/2019 20:47	33	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9229260131	20/07/2019 20:48	20/07/2019 20:49	20	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9234420001009	20/07/2019 20:50	20/07/2019 20:51	53	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923338478550	20/07/2019 21:00	20/07/2019 21:01	38	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 21:06	20/07/2019 21:08	119	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923331333300	20/07/2019 21:09	20/07/2019 21:09	0	OUTGOING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	9229260015	20/07/2019 21:17	20/07/2019 21:18	73	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9229260131	20/07/2019 21:17	20/07/2019 21:18	34	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923313333300	20/07/2019 21:25	20/07/2019 21:25	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	9229260112	20/07/2019 21:32	20/07/2019 21:33	31	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923349958821	20/07/2019 21:50	20/07/2019 21:50	18	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:16	20/07/2019 22:16	0	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923007869999	20/07/2019 22:23	20/07/2019 22:25	149	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:33	20/07/2019 22:33	0	OUTGOING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:35	20/07/2019 22:35	65	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:35	20/07/2019 22:35	0	OUTGOING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:35	20/07/2019 22:35	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:37	20/07/2019 22:37	0	OUTGOING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:38	20/07/2019 22:38	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:39	20/07/2019 22:39	0	OUTGOING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:39	20/07/2019 22:39	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:41	20/07/2019 22:41	0	OUTGOING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:42	20/07/2019 22:42	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:42	20/07/2019 22:42	0	OUTGOING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:44	20/07/2019 22:44	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:44	20/07/2019 22:44	0	OUTGOING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:46	20/07/2019 22:46	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923349958821	20/07/2019 22:47	20/07/2019 22:47	19	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 22:48	20/07/2019 23:04	953	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923349958821	20/07/2019 23:04	20/07/2019 23:05	9	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 23:13	20/07/2019 23:14	39	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	20/07/2019 23:14	20/07/2019 23:18	245	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923306790298	21/07/2019 0:31	21/07/2019 0:31	7	OUTGOING	VOICE	KDA Kohat - KOHAT
357171099164470	923339634123	92334947766	21/07/2019 8:14	21/07/2019 8:15	46	INCOMING	VOICE	Sadrir Valley - KOHAT
357171099164470	923339634123	9233306790298	21/07/2019 8:34	21/07/2019 8:35	64	OUTGOING	VOICE	Babi Zai - KOHAT

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Call No.	Call Date	Call Time	Call Duration	Call Type	Call Status	Call Category
357171099164470	21/07/2019	8:44	7	OUTGOING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	8:44	0	INCOMING	SMS	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	9:38	0	OUTGOING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	9:45	58	INCOMING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	9:57	34	OUTGOING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	11:13	208	INCOMING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	11:17	32	OUTGOING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	11:18	25	INCOMING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	11:58	0	OUTGOING	SMS	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	12:06	0	INCOMING	SMS	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	12:10	0	OUTGOING	SMS	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	12:16	26	INCOMING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	12:21	25	OUTGOING	SMS	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	12:24	0	INCOMING	SMS	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	12:26	0	OUTGOING	SMS	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	12:28	13	INCOMING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	12:33	37	OUTGOING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	12:42	30	INCOMING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	12:45	32	OUTGOING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	12:57	43	INCOMING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	13:05	59	OUTGOING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	13:10	155	INCOMING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	13:15	9	OUTGOING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	13:15	74	INCOMING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	13:25	20	OUTGOING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	13:31	38	INCOMING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	13:35	0	OUTGOING	SMS	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	14:35	30	INCOMING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	15:30	56	OUTGOING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	15:30	0	INCOMING	SMS	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	15:30	0	OUTGOING	SMS	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	15:30	0	INCOMING	SMS	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	16:33	33	OUTGOING	VOICE	Kohat - KOHAT
357171099164470	21/07/2019	16:47	36	INCOMING	VOICE	Kohat - KOHAT
357171099164470	21/07/2019	16:56	0	OUTGOING	SMS	Kohat - KOHAT
357171099164470	21/07/2019	17:26	59	INCOMING	VOICE	Kohat - KOHAT
357171099164470	21/07/2019	17:27	42	OUTGOING	VOICE	Kohat - KOHAT
357171099164470	21/07/2019	17:33	0	INCOMING	SMS	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	17:48	23	OUTGOING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	17:49	46	INCOMING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	18:11	23	OUTGOING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	18:11	17	INCOMING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	18:16	11	OUTGOING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	18:40	12	INCOMING	SMS	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	18:43	23	OUTGOING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	18:52	1	INCOMING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	18:53	7	OUTGOING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	18:54	24	INCOMING	VOICE	KUSTI Chowk - KOHAT
357171099164470	21/07/2019	19:02	45	OUTGOING	VOICE	Togh Pavan - KOHAT
357171099164470	21/07/2019	19:06	0	INCOMING	SMS	Bus Stand - KOHAT
357171099164470	21/07/2019	19:07	29	OUTGOING	VOICE	Muiseb abad - KOHAT
357171099164470	21/07/2019	19:10	14	INCOMING	VOICE	Muiseb abad - KOHAT
357171099164470	21/07/2019	19:23	44	OUTGOING	VOICE	Bahdur Kot - KOHAT
357171099164470	21/07/2019	19:27	58	INCOMING	VOICE	Muiseb abad - KOHAT
357171099164470	21/07/2019	19:35	54	OUTGOING	VOICE	Bus Stand - KOHAT
357171099164470	21/07/2019	19:47	73	INCOMING	VOICE	Kohat - KOHAT
357171099164470	21/07/2019	20:13	15	OUTGOING	VOICE	Kohat - KOHAT
357171099164470	21/07/2019	20:15	13	INCOMING	VOICE	Kohat - KOHAT
357171099164470	21/07/2019	20:25	17	OUTGOING	VOICE	Kohat - KOHAT
357171099164470	21/07/2019	20:27	0	INCOMING	SMS	KUSTI Chowk - KOHAT

Phone Number	Area Code	City	State	Zip	Duration	Rate	Type	Location
357171099164470	923339634123	923339634123	21/07/2019 20:27	21/07/2019 20:27	21	0	INCOMING	Surgul - SURGUL
357171099164470	923339634123	923339634123	21/07/2019 20:41	21/07/2019 20:41	15	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	21/07/2019 20:48	21/07/2019 20:48	0	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	21/07/2019 20:49	21/07/2019 20:49	0	0	OUTGOING	SMS
357171099164470	923339634123	923339634123	21/07/2019 21:05	21/07/2019 21:05	0	0	INCOMING	SMS
357171099164470	923339634123	923339634123	21/07/2019 21:07	21/07/2019 21:07	15	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	21/07/2019 21:08	21/07/2019 21:08	38	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	21/07/2019 21:22	21/07/2019 21:22	0	0	INCOMING	SMS
357171099164470	923339634123	923339634123	21/07/2019 21:23	21/07/2019 21:23	17	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	21/07/2019 21:35	21/07/2019 21:35	25	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	21/07/2019 21:37	21/07/2019 21:37	34	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	21/07/2019 21:38	21/07/2019 21:38	27	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	21/07/2019 21:46	21/07/2019 21:46	83	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	21/07/2019 22:30	21/07/2019 22:30	27	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	21/07/2019 22:39	21/07/2019 22:39	0	0	INCOMING	SMS
357171099164470	923339634123	923339634123	21/07/2019 22:58	21/07/2019 23:01	174	0	INCOMING	SMS
357171099164470	923339634123	923339634123	21/07/2019 23:08	21/07/2019 23:09	82	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	21/07/2019 23:16	21/07/2019 23:16	0	0	INCOMING	SMS
357171099164470	923339634123	923339634123	21/07/2019 23:19	21/07/2019 23:19	0	0	INCOMING	SMS
357171099164470	923339634123	923339634123	21/07/2019 23:35	21/07/2019 23:36	40	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	21/07/2019 23:50	21/07/2019 23:50	0	0	OUTGOING	SMS
357171099164470	923339634123	923339634123	21/07/2019 23:50	21/07/2019 23:50	0	0	OUTGOING	SMS
357171099164470	923339634123	923339634123	21/07/2019 23:50	21/07/2019 23:50	0	0	OUTGOING	SMS
357171099164470	923339634123	923339634123	21/07/2019 23:50	21/07/2019 23:50	0	0	OUTGOING	SMS
357171099164470	923339634123	923339634123	22/07/2019 9:37	22/07/2019 9:37	0	0	INCOMING	SMS
357171099164470	923339634123	923339634123	22/07/2019 10:20	22/07/2019 10:20	0	0	INCOMING	SMS
357171099164470	923339634123	923339634123	22/07/2019 10:24	22/07/2019 10:25	29	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 10:33	22/07/2019 10:33	14	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 10:44	22/07/2019 10:44	33	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 10:46	22/07/2019 10:46	0	0	INCOMING	SMS
357171099164470	923339634123	923339634123	22/07/2019 10:46	22/07/2019 10:46	161	0	OUTGOING	SMS
357171099164470	923339634123	923339634123	22/07/2019 10:50	22/07/2019 10:50	0	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 10:52	22/07/2019 10:52	0	0	OUTGOING	SMS
357171099164470	923339634123	923339634123	22/07/2019 10:52	22/07/2019 10:53	12	0	OUTGOING	SMS
357171099164470	923339634123	923339634123	22/07/2019 10:55	22/07/2019 10:56	42	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 10:59	22/07/2019 11:03	255	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 11:05	22/07/2019 11:05	36	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 11:06	22/07/2019 11:07	55	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 11:12	22/07/2019 11:12	113	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 11:14	22/07/2019 11:14	21	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 11:16	22/07/2019 11:16	0	0	OUTGOING	SMS
357171099164470	923339634123	923339634123	22/07/2019 11:17	22/07/2019 11:17	28	0	OUTGOING	SMS
357171099164470	923339634123	923339634123	22/07/2019 11:25	22/07/2019 11:25	7	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 11:37	22/07/2019 11:38	63	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 11:39	22/07/2019 11:40	25	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 11:39	22/07/2019 11:39	38	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 11:40	22/07/2019 11:40	0	0	INCOMING	SMS
357171099164470	923339634123	923339634123	22/07/2019 11:40	22/07/2019 11:40	36	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 11:40	22/07/2019 11:40	44	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 11:45	22/07/2019 11:45	27	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 11:45	22/07/2019 11:46	39	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 11:47	22/07/2019 11:47	0	0	INCOMING	SMS
357171099164470	923339634123	923339634123	22/07/2019 11:48	22/07/2019 11:49	38	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 12:24	22/07/2019 12:25	47	0	INCOMING	SMS
357171099164470	923339634123	923339634123	22/07/2019 12:26	22/07/2019 12:26	18	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 12:33	22/07/2019 12:34	19	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 12:36	22/07/2019 12:36	38	0	OUTGOING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 12:37	22/07/2019 12:37	73	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 12:38	22/07/2019 12:38	18	0	INCOMING	VOICE
357171099164470	923339634123	923339634123	22/07/2019 12:38	22/07/2019 12:38	23	0	INCOMING	VOICE

(11)

INVT	A Multiplier	P Number	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
357171099164470	923339634123	923339664434	22/07/2019 12:38	22/07/2019 12:39	11	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9229260125	22/07/2019 12:50	22/07/2019 12:51	79	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923329258072	22/07/2019 12:53	22/07/2019 12:53	12	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923349958821	22/07/2019 13:07	22/07/2019 13:08	54	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339538990	22/07/2019 13:18	22/07/2019 13:18	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923364040509	22/07/2019 13:21	22/07/2019 13:23	96	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339588969	22/07/2019 13:29	22/07/2019 13:29	48	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923335318157	22/07/2019 13:34	22/07/2019 13:34	23	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9229260120	22/07/2019 13:38	22/07/2019 13:39	101	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923364040509	22/07/2019 13:40	22/07/2019 13:40	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	92334947766	22/07/2019 13:52	22/07/2019 13:53	74	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923306790798	22/07/2019 14:03	22/07/2019 14:05	149	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923348296166	22/07/2019 14:06	22/07/2019 14:06	28	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339679693	22/07/2019 14:25	22/07/2019 14:25	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923452210129	22/07/2019 14:41	22/07/2019 14:42	20	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923360997549	22/07/2019 14:45	22/07/2019 14:45	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923335994819	22/07/2019 15:04	22/07/2019 15:05	49	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923348296166	22/07/2019 15:07	22/07/2019 15:07	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	9229260116	22/07/2019 15:08	22/07/2019 15:08	35	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	22/07/2019 15:16	22/07/2019 15:16	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	22/07/2019 16:16	22/07/2019 16:16	3600	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	22/07/2019 16:03	22/07/2019 16:03	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923312194890	22/07/2019 16:17	22/07/2019 16:17	30	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	22/07/2019 16:25	22/07/2019 16:25	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	22/07/2019 16:32	22/07/2019 16:33	45	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339664434	22/07/2019 16:37	22/07/2019 16:39	100	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923348335170	22/07/2019 16:40	22/07/2019 16:40	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923348335170	22/07/2019 16:40	22/07/2019 16:40	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923339664434	22/07/2019 16:40	22/07/2019 16:40	16	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923348335170	22/07/2019 16:51	22/07/2019 16:52	56	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923348335170	22/07/2019 17:05	22/07/2019 17:05	14	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923369616438	22/07/2019 17:09	22/07/2019 17:10	57	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923324163073	22/07/2019 17:18	22/07/2019 17:20	89	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923344080163	22/07/2019 17:20	22/07/2019 17:20	45	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339637109	22/07/2019 17:33	22/07/2019 17:35	93	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339631104	22/07/2019 17:41	22/07/2019 17:42	26	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923364040509	22/07/2019 17:43	22/07/2019 17:44	57	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923360997549	22/07/2019 17:48	22/07/2019 17:48	0	OUTGOING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923335994819	22/07/2019 17:49	22/07/2019 17:49	57	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923467974751	22/07/2019 17:50	22/07/2019 17:50	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923360997549	22/07/2019 17:50	22/07/2019 17:50	0	OUTGOING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923467974751	22/07/2019 17:51	22/07/2019 17:51	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923339624318	22/07/2019 17:57	22/07/2019 17:57	21	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339628139	22/07/2019 18:25	22/07/2019 18:25	30	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	22/07/2019 18:29	22/07/2019 18:29	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923348335170	22/07/2019 18:35	22/07/2019 18:36	57	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923348335170	22/07/2019 18:36	22/07/2019 18:37	44	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339631104	22/07/2019 18:37	22/07/2019 18:37	27	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339628139	22/07/2019 18:37	22/07/2019 18:38	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923336500007	22/07/2019 18:45	22/07/2019 18:46	53	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923333293297	22/07/2019 18:46	22/07/2019 18:46	2	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923333293297	22/07/2019 18:46	22/07/2019 18:47	21	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923306790798	22/07/2019 18:48	22/07/2019 18:48	20	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339628139	22/07/2019 18:49	22/07/2019 18:49	20	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923340217801	22/07/2019 18:50	22/07/2019 18:52	133	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339634123	22/07/2019 19:17	22/07/2019 19:18	51	OUTGOING	VOICE	Babi Zai - KOHAT
357171099164470	923339634123	923339664434	22/07/2019 19:24	22/07/2019 19:24	14	INCOMING	VOICE	Miangan Collony - KOHAT
357171099164470	923339634123	923304654419	22/07/2019 19:35	22/07/2019 19:36	64	INCOMING	VOICE	Miangan Collony - KOHAT
357171099164470	923339634123	923336500007	22/07/2019 19:45	22/07/2019 19:45	0	INCOMING	SMS	Miangan Collony - KOHAT
357171099164470	923339634123	923339763411	22/07/2019 19:55	22/07/2019 19:55	33	INCOMING	VOICE	Miangan Collony - KOHAT
357171099164470	923339634123	923339763411	22/07/2019 19:56	22/07/2019 19:56	12	INCOMING	VOICE	Miangan Collony - KOHAT

357171099164470	923339634123	923329258072	22/07/2019 20:04	22/07/2019 20:04	15	INCOMING	VOICE	Mangan Collony - KOHAT
357171099164470	923339634123	923318355004	22/07/2019 20:05	22/07/2019 20:06	01	INCOMING	VOICE	Mangan Collony - KOHAT
357171099164470	923339634123	923347515598	22/07/2019 20:08	22/07/2019 20:08	23	OUTGOING	VOICE	Mangan Collony - KOHAT
357171099164470	923339634123	923339634123	22/07/2019 20:09	22/07/2019 20:09	0	INCOMING	SMS	Mangan Collony - KOHAT
357171099164470	923339634123	923339634123	22/07/2019 20:09	22/07/2019 20:10	65	OUTGOING	VOICE	Mangan Collony - KOHAT
357171099164470	923339634123	923339601588	22/07/2019 20:11	22/07/2019 20:11	38	OUTGOING	VOICE	Mangan Collony - KOHAT
357171099164470	923339634123	923364040509	22/07/2019 20:14	22/07/2019 20:15	50	OUTGOING	VOICE	Mangan Collony - KOHAT
357171099164470	923339634123	92335994819	22/07/2019 20:18	22/07/2019 20:19	19	INCOMING	VOICE	Mangan Collony - KOHAT
357171099164470	923339634123	923331333300	22/07/2019 20:22	22/07/2019 20:22	0	OUTGOING	SMS	Mangan Collony - KOHAT
357171099164470	923339634123	923318355005	22/07/2019 20:55	22/07/2019 20:56	0	INCOMING	SMS	Mangan Collony - KOHAT
357171099164470	923339634123	923364040509	22/07/2019 21:01	22/07/2019 21:01	9	INCOMING	VOICE	Mangan Collony - KOHAT
357171099164470	923339634123	923306790798	22/07/2019 21:28	22/07/2019 21:28	25	OUTGOING	VOICE	Bus Stand - KOHAT
357171099164470	923339634123	923335994819	22/07/2019 21:33	22/07/2019 21:34	151	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923369616438	22/07/2019 21:40	22/07/2019 21:41	14	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923349958821	22/07/2019 21:42	22/07/2019 21:42	27	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923305247114	22/07/2019 21:47	22/07/2019 21:48	11	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923349958821	22/07/2019 21:55	22/07/2019 21:55	77	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923306790798	22/07/2019 21:57	22/07/2019 21:57	25	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923089369125	22/07/2019 21:57	22/07/2019 21:59	88	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339198847	22/07/2019 22:03	22/07/2019 22:03	42	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339640663	22/07/2019 22:06	22/07/2019 22:07	45	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923306790798	22/07/2019 22:07	22/07/2019 22:08	55	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923338969859	22/07/2019 22:08	22/07/2019 22:09	38	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	9229260131	22/07/2019 22:11	22/07/2019 22:11	56	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923329053311	22/07/2019 22:17	22/07/2019 22:18	10	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923349958821	22/07/2019 22:18	22/07/2019 22:18	33	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923335994819	22/07/2019 22:18	22/07/2019 22:20	17	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923335994819	22/07/2019 22:22	22/07/2019 22:22	83	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	22/07/2019 22:28	22/07/2019 22:28	8	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	22/07/2019 22:28	22/07/2019 22:28	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	9233219619065	22/07/2019 22:36	22/07/2019 22:37	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923360997549	22/07/2019 22:39	22/07/2019 22:39	63	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923360997549	22/07/2019 22:39	22/07/2019 22:39	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923304654419	22/07/2019 22:40	22/07/2019 22:41	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	923376001417	22/07/2019 22:44	22/07/2019 22:46	66	INCOMING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923306790798	22/07/2019 22:46	22/07/2019 22:48	103	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	923339626960	22/07/2019 22:50	22/07/2019 22:50	110	OUTGOING	VOICE	KUST Chowk - KOHAT
357171099164470	923339634123	92333563945	22/07/2019 23:03	22/07/2019 23:04	0	INCOMING	SMS	KUST Chowk - KOHAT
357171099164470	923339634123	92333563945	22/07/2019 23:03	22/07/2019 23:04	93	INCOMING	VOICE	KUST Chowk - KOHAT

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Amr P. B. - P. 10.

POLICE DEPARTMENT

DISTRICT KOHAT

ORDER

In compliance with the judgment dated 02.12.2021, passed by Khyber Pakhtunkhwa the Service Tribunal Peshawar in service appeal No.3326/2020 and approval of competent authority vide CPO letter No.3123/ Legal dated 23.06.2022, Ex-Constable Abdul Wahab No.50 is hereby reinstated in service with immediate effect conditionally / provisionally subject to the outcome of CPLA. filed against the impugned judgment before August Supreme Court of Pakistan.

OB NO. 20 /SRC  
Dated. 30-6 /2022

(MUHAMMAD SULEMAN) PSP  
District Police Officer,  
Kohat

OFFICE OF THE DISTRICT POLICE OFFICER KOHAT

No 6086-88 /SRC, dated Kohat the 30/6 /2022.

Copy of above is submitted to the Regional Police Officer Kohat Region Kohat for favour of information please.

2. Reader / Line Officer / Pay Officer / OHC for necessary action.
3. Official concern to report in Police line Kohat immediately.

(MUHAMMAD SULEMAN) PSP  
District Police Officer,  
Kohat

Amir B/...

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POLICE DEPARTMENT

DISTRICT KOHAT

ORDER

In compliance with the judgment dated 02.12.2021, passed by Khyber Pakhtunkhwa the Service Tribunal Peshawar in service appeal No.3324/2020 and approval of competent authority vide CPO letter No.3124/Legal dated 23.06.2022. Ex-Constable Muhammad Abid No.408 is hereby reinstated in service with immediate effect conditionally / provisionally subject to the outcome of CPLA. filed against the impugned judgment before August Supreme Court of Pakistan.

OB NO. 199 /SRC  
Dated. 30-6-2022

(MUHAMMAD SULEMAN) PSP  
District Police Officer,  
Kohat

OFFICE OF THE DISTRICT POLICE OFFICER KOHAT

No 6289-91 /SRC, dated Kohat the 30/6 2022.

Copy of above is submitted to the Regional Police Officer Kohat Region Kohat for favour of information please.

2. Reader / Line Officer / Pay Officer / OHC for necessary action.
3. Official concern to report in Police line Kohat immediately.

(MUHAMMAD SULEMAN) DSP  
District Police Officer,  
Kohat

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

P-12

Service Appeal No. 205/2022

Ayat Ullah  
SI, District Kohat

..... Appellant

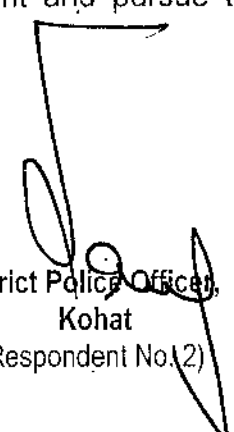
**VERSUS**

Regional Police Officer,  
Kohat & other

..... Respondents

**AUTHORITY LETTER**

Mr. Arif Saleem steno (Focal Person) of this office is hereby authorized to file the parawise comments and any other registered documents in the Honorable Tribunal on behalf of respondents / defendant and pursue the appeal as well.

  
District Police Officer,  
Kohat  
(Respondent No. 2)