

06.10.2020

Appellant in person present.


Learned counsel for the appellant is not in attendance due to general strike on the call of Khyber Pakhtunkhwa Bar Council. The matter is adjourned to 10.12.2020 for hearing before S.B.


Chairman

10.12.2020

Nemo for appellant.

Case is adjourned to 16.03.2021 for preliminary hearing before S.B.


(Rozina Rehman)
Member (J)

16.03.2021

Due to tour of Camp Court Abbottabad and shortage of Members at Principal Bench Peshawar, the case is adjourned to 23.06.2021 before S.B.

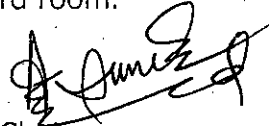

Reader

23.06.2021

Appellant with counsel present.

Learned counsel for the appellant states that the appellant has been reinstated into service. He submitted an application for withdrawal of instant appeal through this office Diary No. 837, dated 22.06.2021 which is placed on file.

In view of the above, the present appeal is dismissed as withdrawn. File be consigned to the record room.


Chairman

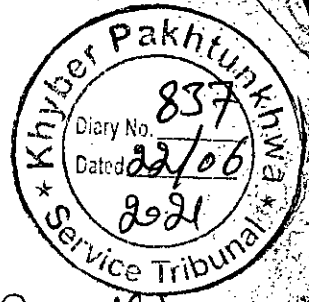
ANNOUNCED

23.06.2021

Before the Honorable Service Tribunal

Put up to the Honorable chair-man
with relevant appeal.

Peshawar



Reader Rohim Gul ^{22/6/2021} /s/ IGP- etc (Receipt)
Appellant Service Appeal

Application for withdrawal of
Service Appeal:

R/shaweth,

The Council for the appellant
submits as Under.

- i) The subject above Service appeal
is fixed for 23/6/2021 for preliminary hearing.
- ii) That the services of the appellant has
been reinstated by respondent.
- iii) That on the above circumstances it is
humbly submission that the instant
Service appeal may kindly be withdrawn.

Dt: - 22-6-2021

Council for Appellant
Syed Qudus Pizada
Advocate HC

0345-9645854

30.03.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 19.06.2020 before S.B.


Reader

19.06.2020

Nemo for the appellant.

Preceding order sheet shows that the case was adjourned through reader's note, therefore notice be issued to the appellant and his counsel for 13.08.2020.

Adjourned to 13.08.2020 before S.B.


(Rozina Rehman)
Member (J)

13.08.2020

Nemo for the appellant.

On the last date notice was required to be issued to the appellant and his learned counsel for today.

The record, however, contains copy of the notice addressed to learned counsel who hails from Kohat. Neither there is any copy of notice to the appellant nor postal receipt is attached with notice to the counsel.

The office is directed to strictly comply with the order dated 19.06.2020. Adjourned to 06.10.2020 before S.B.



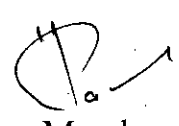

Chairman

FORM-A

FORM OF ORDER SHEET

Court of _____

Case No. 2255/2019


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1.	31/12/2019	<p>The appeal of Rahim Gul resubmitted today by Syed Muddasir Pirzada Advocate may entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 31/12/19</p>
2.	06/01/20	<p>This case is entrusted to S.Bench for preliminary hearing to be put up there on <u>10/02/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	10.02.2020	<p>Learned counsel for the appellant present and seeks adjournment. Adjourn. To come up for arguments on 30.03.2020 before S.B.</p> <p style="text-align: right;"> Member</p>

The appeal of Mr. Rahim Gul Ex- Police Constable Kohat received today i.e. on 26.12.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Copy of impugned order dated 16.08.2019 is illegible which may be replaced by legible/better one.

No. 2254 /S.T,

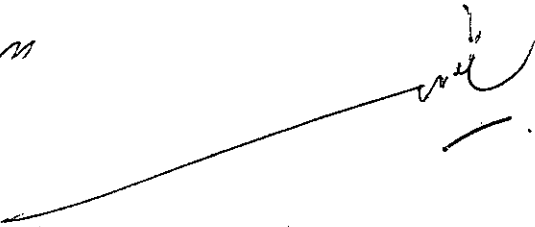
Dt. 26/12 /2019.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Mudasir Pirzada Adv. Kohat.

31/12/2019

Re-Submitted after removal
The objection



BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal 2955 2019

Rahim Gul (Ex-Police Constable) R/o Tappi 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)

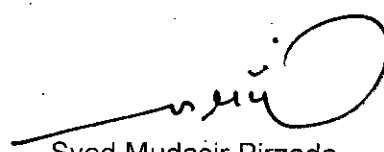
INDEX

Sr No	Description of Documents	Annexure	Page
1	Memo of Appeal		1-3
2	Affidavit		4
3	Address of the Parties		5
4	Copy of (Final Show Cause Notice) & impugned Order dated 16-08-2019	A	6-7
5	Copy of Dept representation 11-09-2019 & Rejection order , dated:-26-11-2019	B	8-9
6	Copy of Reply to FCN	C	10-11
7	Wakalat Nama	D	12


Appellant

Through

Date 24/12/2019


Syed Mudasir Pirzada
Advocate HC
0345-9645854

①

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Rahim Gul (Ex-Police Constable) R/o Tappi Kohat

(Appellant) **Khyber Pakhtunkhwa
Service Tribunal**

VERSUS

Diary No. 2326

Dated 26/12/19

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 16-08-2019 IN WHICH THE RESPONDENT NO:-3 DIRECTLY AWARD THE MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE WITHOUT ANY LAWFUL JUSTIFICATION THE APPELLANT PREFERRED DEPARTMENTAL REPRESENTATION DATED 11-09-2019 AND THE SAME WAS REJECTED ON DATED 26-11-2019.

Pray:

In view of above submission it is requested, by accepting of instant appeal the impugned order of Respondent No-3 may be set aside and the present appellant service may please be re-stored with all back benefits .

Respectfully Sheweth;

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

Facts:

Briefly facts are that as per the impugned order and allegation mention in FCN that it has been notice through reliable source /secret information that the appellant being member of a disciplined force the appellant indulged in business of narcotics and the appellant are supporting the criminal gang of Tappo Nusrat khel.(Copy of Impugned order & FCN and reply is annexed as annexure A)

That due to the above allegation the appellant was awarded major punishment of dismissal from service with immediate effect (Copy of departmental representation along with rejection order is annexed as annexure B)

That the allegations mentioned against the appellant is base less and there is no reality nor proved with any cogent reason and not base on the sound reason the appellant belongs to a pious family and never ever indulged in any such like of corrupt practices and without any sufficient prove the appellant services were dismissed, only issued FCN and the appellant submitted the reply to FCN which was not consider (Copy of Reply of FCN annexed as annexure C).

That again 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. Just on the basis of secretly probing held guilty the

Filed to-day

Registrar

Ref sub-itted

to-day 31/12/19

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

1. That there is nothing on record which connects the appellant with the allegation.
2. That nothing has been proved beyond any shadow of doubt that the appellant has committed any misconduct or tarnished the image of Police department.
3. 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.
4. 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 enquiry rules have not been observed while awarding the impugned punishment.
5. That the appellant dragged unnecessarily into litigation which is clearly mentioned in 2008 SCMR 725.
6. That while awarding the impugned major punishment the enquiry report has not been given to the appellant which is very much necessary as per 1991 PLC CS 706 & PLC 1991 584.
7. That the appellant never ever admit before any forum regarding any admittance of alleged guilt.
8. That the appellant is feeling aggrieved from the impugned order hence preferred service appeal on the following grounds.

Grounds:

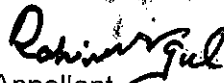
- a. That during enquiry none from the general public was examined in support of the charges leveled against the appellant. No allegation mentioned above are practiced by the appellant nor proved against any cogent reason against the appellant.
- b. That the appellant was neither intimated nor informed by any source of medium regarding enquiry proceedings for any disciplinary action which shows bias on the part of quarter concern.
- c. That the punishment is harsh in nature and the appellant is falsely vexed for undone offence which is against the constitution of Islamic republic of Pakistan 1973.
- d. That the appellant is honest and dedicated one and leave no stone unturned to discharge his duties.

(3)

- e. That as per universal declaration of human rights 1948 prohibits the arbitral / discretion.
- f. That the Respondent No-3 has acted whimsically and arbitrary, which is apparent from the impugned order.
- g. 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.
- h. That the departmental enquiry was not conducted according to the rules.
- i. That the impugned order is outcome of surmises and conjecture.
- j. That proper rule have not been observed while awarding the major punishment .
- k. That there is no CDR data regarding information or any source define in impugned order nor have obtain any legal opinion from learned DSP-Legal Kohat for conducting the enquiry against appellant nor discussed the mode and manner of enquiry proceedings .


Pray:

In the view of above circumstances it is humbly prayed that the impugned order of Respondent No-3 dated 16-08-2019 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

Through

Date 24/12/19


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.

(4)

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

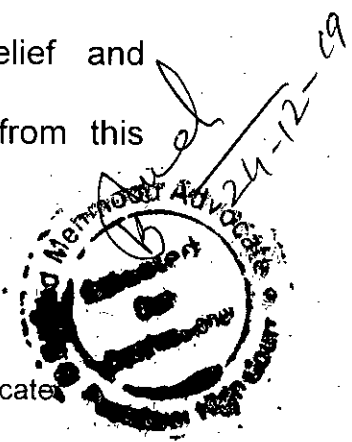
Service Appeal _____ 2019

AFFIDAVIT

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

Mudasir Pirzada

Advocate



5

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Rahim Gul (Ex-Police Constable) R/o Tappi 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)

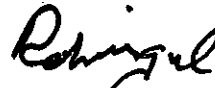
ADDRESS OF THE PARTIES

APPELLANT :-

Rahim Gul (Ex-Police Constable) R/o Tappi Kohat

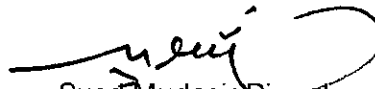
RESPONDENTS

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



Appellant

Through,



Syed Mudasar Pirzada
Advocate PHC
0345-9645854

Date 24/12/19



Attest
[Signature]

Annexure A
Page (6)

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

No. 8743 /PA dated Kohat the 19 / 7 / 2019

FINAL SHOW CAUSE NOTICE

I, Capt. @ Wahid Mehmood, District Police Officer, Kohat as competent authority, under the Khyber Pakhtunkhwa Police Rules 1975, (amended 2014) is hereby serve you, Constable Rahim Gul No. 1203 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. 8112-13/PA dated 04.07.2019.
- 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.

It has been notice through reliable source / secret information that you being member of a disciplined force, you indulged yourself in business of narcotics and your are supporting the criminal gang of Tapoo Nusrat Khel.

- 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 an ex parte action shall be taken against you.
- 5. The copy of the finding of inquiry officer is enclosed.

[Signature]

DISTRICT POLICE OFFICER,
KOHAT 19/7/19



Attest
[Signature]

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

P-(7)(7)

ORDER

This order is passed on the departmental enquiry conducted against Constable Raheem Gul No. 1203 under the Khyber Pakhtunkhwa Police Rules, 1975 (amendment 2014).

Brief facts of the case are that it was noticed through reliable source / secret information that the accused official being member of a disciplined force, indulged himself in narcotics selling/trafficking, links & support the most notorious criminal gang of Nusrat Khat and indulged himself in extra departmental activities.

The accused official was served with charge sheet & statement of allegation and SOPO Sadder, Kohat was appointed as enquiry officer to scrutinize the conduct of accused official. The enquiry officer vide his finding held him guilty of the charge and recommended for major punishment.

In view of above Final Show Cause Notice alongwith finding of enquiry was served upon the accused official. Reply to Show Cause Notice was received unsatisfactory.

Therefore, the defaulter official was called in O.R held on 16.08.2019 and heard in person, but he failed to advance any plausible explanation to his misconduct.

I have gone through the available record, which transpires that the accused official was involved in business of narcotics and supported the notorious criminal gang of Nusrat Khat. Besides the finding and recommendation of enquiry officer, the source was confirmed by the undersigned. Hence, the charge / allegations leveled against the accused official are established beyond any shadow of doubt, he is a stigma on Police force and earned bad name to the entire force. Therefore, in exercise of the powers conferred upon me under the rules ibid, I Capt. @ Wahid Mehmood District Police Officer, Kohat hereby impose a major punishment of "dismissal from service" on accused constable Raheem Gul No. 1203 with immediate effect. The kit etc issued to the accused official to be collected immediately.

Announced
16.08.2019

DISTRICT POLICE OFFICER,
KOHAT

[Signature]
15/8

OS No. 1020

Date 16.08 /2019

No. 9983-8 SPA dated Kohat the 16.08 2019.

Copy of above to the:
1. R.I/Reader/SRC/OHC for necessary action

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

This order is passed on the departmental enquiry conducted against Constable Raheem Gul No 1203 under the Khyber Pakhtunkhwa Police Rules, 1975 (Amendment 2014)

Brief facts of the case are that it was notices through reliable source/secret information that the accused official being member of a disciplined force, indulged himself in narcotics selling / trafficking, links & support the most notorious criminal gang of Nusrat Khel and indulged himself in extra departmental activities.

The accused official was served with charge sheet & statement of allegation and SDPO Saddar Kohat was appointed as enquiry officer to scrutinize the conduct of accused official. The enquiry officer vide his finding held him guilty of the charge and recommended for major punishment.

In view of above Final Show Cause Notice alongwith finding of enquiry was served upon the accused official. Reply to Show Cause Notice was received unsatisfactory.

Therefore, the defaulter official was called in O.R held on 16.08.2019 and heard in person but he failed to advance any plausible explanation to his misconduct.

I have gone through the available record, which transpires that the accused official was involved in business of narcotics and supported the notorious criminal gang of Nusrat Khel. Besides the finding and recommendation of enquiry officer, the source was confirmed by the undersigned. Hence, the charge / allegations leveled against the accused official are established beyond any shadow of doubt, he is a stigma on Police Force and earned bad name to the entire force. Therefore, in exercise of the powers conferred upon me under the rules ibid, I Capt ® Wahid Mehmood District Police Officer, Kohat hereby impose a major punishment of "Dismissal from Service" on accused constable Raheem Gul No 1203 with immediate effect. The kit etc issued to the accused official be collected immediately.

Announced
16.08.2019

**DISTRICT POLICE OFFICER
KOHAT**

OB No. 1020

Date 16.08.2019

No. 9983-85/PA dated Kohat the 16.08.2019

Copy of above to the:-

R.I/reader /SRC/OHC for necessary action.

ATTESTED

- 9
- D. That the impugned order was not sustainable under the law.
- E. That the appellant possessed cell phone No. 0333-1444988 Registered in his name. The enquiry officer should have checked the same to unearth any connection of the appellant with the alleged gang of the notorious criminals.
- F. That copy of the finding report of the enquiry report was not provided to the appellant alongwith the final show cause notice to enable him to offer his explanation with regard to adverse findings if any recorded against the appellant. In case copy of the enquiry report was supplied to the appellant, he may have been able to satisfy DPO Kohat that the findings recorded by the enquiry officer were erroneous or not justified. The supply of copy of findings report of the enquiry officer to the appellant was necessary in order to satisfy the interests of natural justice. Due to such omission, the appellant was deprived of the opportunity to explain the adverse findings recorded therein.
- G. That the information conveyed to the DPO Kohat were totally false and baseless furnished by an ill wisher of the appellant with the intention to harm and defame the appellant for his ulterior motives.

PRAYER:- In view of the above submissions, it is prayed that by accepting the instant appeal, the impugned order may be set aside and the humble appellant re-instated in service w.e.f the date of his dismissal with all back benefits.

Dated : 11-09-2019

Yours Obediently

Reshim Gul
Ex - Constable Rahcem Gul No.1203
S/O Reshim Gul
R/O Moh. Hassan Khel Tappi Kohat
PS MRS Kohat.

POLICE DEPTT:

KOHAT REGION

Attest
10

ORDER.

This order will dispose of a departmental appeal, moved by Ex-Constable Rahim Gul No. 1203 Operation Staff Kohat against the punishment order, passed by DPO Kohat vide OB No. 1020, dated 16.08.2019 whereby he was awarded major punishment of dismissal from service for the allegations of establishing links with most notorious gang of Nasrat Khel and supplying narcotics to them.

He preferred an appeal to the undersigned upon which comments were obtained from DPO Kohat and his service record was perused. He was also heard in person in Orderly Room, held on 14.11.2019. During hearing, he did not advance any plausible explanation in his defense to prove his innocence and just move forwarded lame excuses.

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. Being a member of disciplined force, he was not supposed to indulge himself in such illegal activities. Therefore, his appeal being devoid of merits is hereby rejected.

Order Announced
14.11.2019

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

No. 10843- /EC, dated Kohat the 26/11 /2019.

Copy to District Police Officer, Kohat for information w/r to his office Letter No. 17075/LB, dated 25.09.2019. His Service Roll & Fauji Missal / Enquiry File is returned herewith.

DSP/L + SRC + OHC
27/11/19



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

Handwritten mark

Ameeam C

P-12 (11)
Ahsan
تیسویں

جناب عالی!

خواجہ فاضل شکرانوش بہ 8743/PA موقع 19-7-19 مجاہد صاحب DPO صاحب
 کو چنانچہ عروض خدمت ہوں کہ سائل نے 19 سال سروں تک لوہے کی
 گزر رہے جو نہایت خوش اسلوبی سے / فرالٹس ڈیوٹی سرانجام دی اور صلح
 کے مختلف ٹھکانہ خانہ جو کہایت میں ڈیوٹی آئی ہے۔ آج تک کوئی ایسا
 غیر پسین فعل نہیں آتا ہے۔ جو کہ ہذا آئی بدنامی کا باعث ہے۔
 جہاں تک سائل پر الزام ہے، یہ سائل امتیازاً از قلم ویر کا کاروبار
 کرتا ہے۔ بالکل منگ اور بے بنیاد الزام ہے۔ کسی نے ذاتی بنیاد اور
 رخصت کو جو ہم سے سائل پر یہ الزام لگایا ہے۔ کیونکہ ایسے قسم کی صورتیں
 ساتھ کرتے والد بندہ نیکم عوام اور صفحہ اداروں کے لوگوں میں ایجاد
 ہے۔ آج تک کوئی بھی صفحہ ادارے سائل پر کہہ قسم کی روایت نہیں
 دی ہے۔ کیونکہ سائل بے طرح حاضر کا مالک ہے۔ اور نہ اس قسم
 کے لوگوں کیساتھ کوئی لین دین ہے۔ علاوہ ازیں اگر میں اس قسم کے
 مکروہ دھندے میں ملوث ہوتا، تو کب لوہے کے ہاتھوں گرفتار ہوتا
 کیونکہ ہر حکم لوہے کا سروں موجود ہے۔

ذہاب والا۔ جہاں تک مجھے علم ہے، الزام ذاتی رخصت کی وجہ سے لگا
 گیا ہے۔ اور صفحہ ادارے کے سربراہان کو بدنام کرنے کی کوئی سازش
 کی جا رہی ہے۔
 اللہ کو حاضر ناظر ہاتھ ہوتے کہتا ہوں کہ آج تک اس قسم کے مکروہ
 دھندے نہ کیا ہے۔ اور نہ اس طرح کے لوگوں سے کوئی تعلق ہے۔ جو اس
 سروں میں اس طرح کا الزام سائل پر پہلا بار لگا ہے۔ جو اس
 منگ، من گھڑت اور بے بنیاد ہے۔ اس میں کوئی صداقت نہیں ہے۔
 اور میں اس قسم کی صفائی دینے کیلئے تیار ہوں۔

استدعا ہے۔ کہ شکرانوش کو دراصل دفتر فرامادھا وے سائل
 کا صاحب دیکھا گیا۔ یہ میرا بیان ہے۔
 رحیم نکل 1253 مشین لولہ کی کوٹھی



2251

12

ایڈوکیٹ/دستخط:

بار کونسل ابار ایسوسی ایشن نمبر 1969-09-06

رابطہ نمبر: 0345-9645854

کوہاٹ بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: KPK اسٹریٹ لٹریچر

منجانب: <u>رحیم گل</u>	دعویٰ: <u>اسٹریٹ لٹریچر</u>
<u>رحیم گل</u>	علت نمبر: <u>2</u>
<u>بنام</u>	مورثہ: <u>/</u>
<u>199</u>	حکم: <u>/</u>
	تھانہ: <u>/</u>

باعت تحریر آنکہ

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

آن مقام 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 تقر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف وصول کرنے کا حقدار ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب با بند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے۔

المرقوم 24/12/19
گواہ شد

**OFFICE OF THE
DISTRICT POLICE OFFICER
KOHAT**

ORDER

This order is passed on the departmental enquiry conducted against Constable Raheem Gul No 1203 under the Khyber Pakhtunkhwa Police Rules, 1975 (Amendment 2014)

Brief facts of the case are that it was notices through reliable source/secret information that the accused official being member of a disciplined force, indulged himself in narcotics selling / trafficking, links & support the most notorious criminal gang of Nusrat Khel and indulged himself in extra departmental activities.

The accused official was served with charge sheet & statement of allegation and SDPO Saddar Kohat was appointed as enquiry officer to scrutinize the conduct of accused official. The enquiry officer vide his finding held him guilty of the charge and recommended for major punishment.

In view of above Final Show Cause Notice alongwith finding of enquiry was served upon the accused official. Reply to Show Cause Notice was received unsatisfactory.

Therefore, the defaulter official was called in O.R held on 16.08.2019 and heard in person but he failed to advance any plausible explanation to his misconduct.

I have gone through the available record, which transpires that the accused official was involved in business of narcotics and supported the notorious criminal gang of Nusrat Khel. Besides the finding and recommendation of enquiry officer, the source was confirmed by the undersigned. Hence, the charge / allegations leveled against the accused official are established beyond any shadow of doubt, he is a stigma on Police Force and earned bad name to the entire force. Therefore, in exercise of the powers conferred upon me under the rules ibid, I Capt ® Wahid Mehmood District Police Officer, Kohat hereby impose a major punishment of "Dismissal from Service" on accused constable Raheem Gul No 1203 with immediate effect. The kit etc issued to the accused official be collected immediately.

Announced
16.08.2019

**DISTRICT POLICE OFFICER
KOHAT**

OB No. 1020

Date 16.08.2019

No. 9983-85/PA dated Kohat the 16.08.2019

Copy of above to the:-

R.I/reader /SRC/OHC for necessary action.