

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1767/2019

Date of Institution ... 12.12.2019

Date of Decision ... 22.06.2021

Mr. Sabir Shah Ex-Police Constable Belt No 89 R/o Kohat.

... (Appellant)

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa Peshawar and two other.

... (Respondents)

SYED MUDASIR PIRZADA

Advocate

... For Appellant

MR. ASIF MASOOD ALI SHAH,

Deputy District Attorney

... For Respondents

MR. AHMED SULTAN TAREEN

...

CHAIRMAN

MR ATIQ UR REHMAN WAZIR

...

MEMBER (E)

 JUDGMENT: -

Mr. ATIQ UR REHMAN WAZIR MEMBER (E): - This judgment shall dispose of the instant service appeal as well as connected Service Appeal No. 1768/2019 titled Shah Muhammad, as similar question of law and facts are involved therein.

2. Brief facts of the case are that the appellant, while serving as constable in Kohat Police, was charged in FIR dated 23-09-2019 U/s 118 Police Act, 2017 on the charges of leakage of information about a raid plan targeted against a group of miscreants, which resulted into failure of such raid. The appellant was arrested, but he obtained release on bail after four days. Simultaneously he was also proceeded against, under Police Rules, 1975 and was awarded major punishment of dismissal from service vide

impugned order dated 28-09-2019. Feeling aggrieved, the appellant filed departmental appeal dated 22-10-2019, which was rejected on 14-11-2019, hence the instant service appeal instituted on 12-12-2019 with prayers that impugned order dated 28-09-2019 may be set aside and the appellant may be re-instated in service with all back benefits.

03. Written reply/comments were submitted by respondents.

04. Arguments heard and record perused.

05. Learned counsel for the appellant contended that the appellant was charge sheeted on 21-09-2019 with the allegations that the appellant leaked information pertaining to a raid planned by police party against group of proclaimed offenders. Learned counsel for the appellant further contended that the appellant furnished reply to the charge sheet on 25-09-2019, but on 25-09-2019 final Show Cause Notice was also served upon the appellant and on 28-09-2019 the impugned order of dismissal was also issued. Learned counsel for the appellant added that the impugned order was issued without observing the legal formalities. That no regular inquiry was conducted and the appellant was condemned unheard. Learned counsel for the appellant argued that without conducting proper inquiry, how it was ascertained that the appellant was in the knowledge of the secret plan of raid. That how it was ascertained that the appellant was in contact with the criminals. That the charges leveled against the appellant are evasive in nature. That proceedings against the appellant were initiated on 21-09-2019, which culminated on 28-09-2019 with dismissal of the appellant. That dispensation of regular inquiry in awarding major penalty of dismissal is against law and rule. Reliance was placed on 2017 SCMR 356. Learned counsel for the appellant prayed that since the appellant was not treated in accordance with law, hence the impugned order dated 28-09-2019 being unlawful,

may be set aside and the appellant may be re-instated in service with all back benefits.

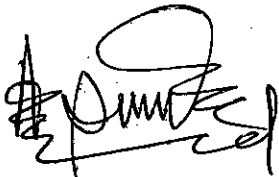
06. Learned Deputy District Attorney appeared on behalf of official respondents and contended that the appellant was proceeded against in accordance with law. That charge sheet/statement of allegations and final Show Cause Notice were served upon the appellant, to which he responded accordingly. That proper inquiry was conducted against the appellant and the appellant joined the inquiry proceedings and was afforded opportunity of personal hearing. That the appellant being member of a disciplined force, committed gross misconduct by leaking secret information to the criminals. That charges have been proved against the appellant beyond any shadow of doubt. Learned Deputy District Attorney prayed that the instant appeal being devoid of merit may be dismissed.

07. We have heard learned counsel for the parties and perused the record. Record reveals that charge sheet and statement of allegations were served upon the appellant on 21-09-2019, simultaneously appointing an inquiry officer with directions to conduct inquiry within 25 days in accordance with provisions contained in Police Rules, 1975, after providing reasonable opportunity of defense to the appellant. The appellant responded to the charge sheet on 25-09-2019 and on the same date (25-09-2019) final Show Cause Notice was served upon the appellant and on the same date inquiry report was also submitted by the inquiry officer, which shows that no opportunity of defense was afforded to the appellant and he was condemned unheard. It was also noted that the impugned order was issued on 28-09-2019 and the whole proceedings including his dismissal from service were completed within seven days, which manifests that the appellant was not treated in accordance with law. The inquiry report placed on record is also replete with deficiencies and its findings are not supported by solid evidences nor any opportunity was afforded to the appellant to

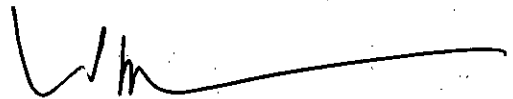
cross-examine witnesses. No record of telephonic contacts of appellant with the criminals is available on record to strengthen the allegations leveled against the appellant. It was also noted that an FIR was also registered against the appellant on the same charges, but District Public Prosecutor Kohat recommended discharge of such FIR U/s 4C (II) of the Khyber Pakhtunkhwa Prosecution Service Act, 2005 read with Section 494 CrPc due to lack of evidences against the accused.

08. In view of the situation, the impugned order dated 28-09-2019 is set aside and the appellant is re-instated in service for the purpose of De-Novo inquiry with directions to the respondents to conduct proper inquiry strictly in accordance with rule and law within a period of ninety days by providing appropriate opportunity of defense to the appellant. The issue of back benefits is conditional with the outcome of De-Novo inquiry. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED
22.06.2021



(AHMED SULTAN TAREEN)
CHAIRMAN



(ATIQ UR REHMAN WAZIR)
MEMBER (EXECUTIVE)

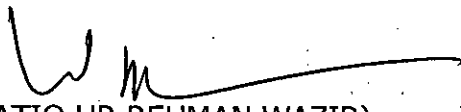
22.06.2021

Learned counsel for the appellant and Mr. Asif Masood Ali Shah, learned Deputy District Attorney for respondents present. Arguments heard and record perused.

Vide detailed judgment of today of this Tribunal placed on file, the impugned order dated 28-09-2019 is set aside and the appellant is reinstated in service for the purpose of De-Novo inquiry with directions to the respondents to conduct proper inquiry strictly in accordance with rule and law within a period of ninety days by providing appropriate opportunity of defense to the appellant. The issue of back benefits is conditional with the outcome of De-Novo inquiry. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED
22.06.2021



(AHMED SULTAN TAREEN)
CHAIRMAN


(ATIQ UR REHMAN WAZIR)
MEMBER (E)

Sir,

1. PUC is a list of cases heard & announced by the then Chairman Justice (Rtd) Hamid Farooq Durrani (Late) but judgment could not be written due to his illness & demise later on.

2/N. Submitted for perusal and orders, please.


Registrar *aw*
9/6/2021.

3. Worthy Chairman

The cases enumerated in the PUC be fixed before a Special D.B comprising the undersigned and the worthy Member who sat in the Bench with the then Worthy Chairman at the time of hearing, for further dealing with the matter in accordance with law, after notices to the parties. 1-e-22-06-2021


Chairman

4. Registrar

05.03.2021


Learned counsel for the appellant and Mr. Asif Masood Ali Shah, learned Deputy District Attorney for respondents present.

Vide detailed judgment of today of this Tribunal placed on file, the impugned order dated 28-09-2019 is set aside and the appellant is reinstated in service for the purpose of De-Novo inquiry with directions to the respondents to conduct proper inquiry strictly in accordance with rule and law within a period of ninety days by providing appropriate opportunity of defense to the appellant. The issue of back benefits is conditional with the outcome of De-Novo inquiry. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED

05.03.2021

(HAMID FAROOQ DURRANI)
CHAIRMAN



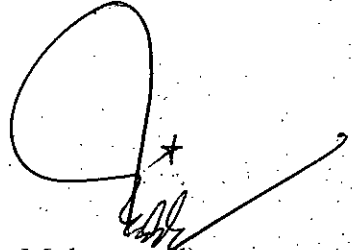
(ATIQ UR REHMAN WAZIR)
MEMBER (E)

19.08.2020

None for the appellant present. Mr. Ziaullah; DDA alongwith Mr. Arif Saleem, Steno for respondents present.

Written reply not submitted. Representative of the respondents seeks time to submit the same on the next date of hearing.

Adjourned to 09.10.2020 before S.B.


(Mian Muhammad)
Member(E)

09.10.2020

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

Representative of the respondents seeks further time to submit reply/comments. Adjourned to 03.12.2020 on which date the requisite reply/comments shall positively be furnished.


Chairman

03.12.2020

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

Representative of respondents has submitted parawise comments/reply by the respondents. Placed on record. The matter is assigned to D.B for arguments on 05.03.2021. The appellant may furnish, rejoinder within one month, if so advised.


Chairman

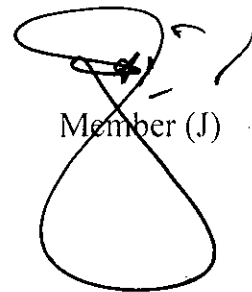
22.06.2020

Appellant Sabir Shah alongwith his counsel present.
Preliminary arguments heard.

It was submitted by learned counsel for appellant that the present appellant was charged for having contacts with notorious proclaimed offenders group wanted in numerous crimes including target killing of four (04) police officers and that on midnight on 20th and 21st September 2019, police raid was planned on the abode of proclaimed offenders but the present appellant provided information to the gang due to which the operation secrecy was leaked by him willfully. He contended that the allegation mentioned against the appellant is baseless and that he was not given an opportunity of cross-examination as well as he was not heard in person. The learned counsel submitted that the appellant was also charged in FIR No.478 dated 23.09.2019 U/S 216 PPC, 118 Police Act-2017 but the appellant was discharged by the prosecution. He contended that no proper inquiry was initiated and that the impugned order is not based on sound reasons, as enquiry was not conducted according to rules.


Security & Process Fee

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Notice be issued to the respondents. To come up for written reply/comments on 19.08.2020 before S.B.

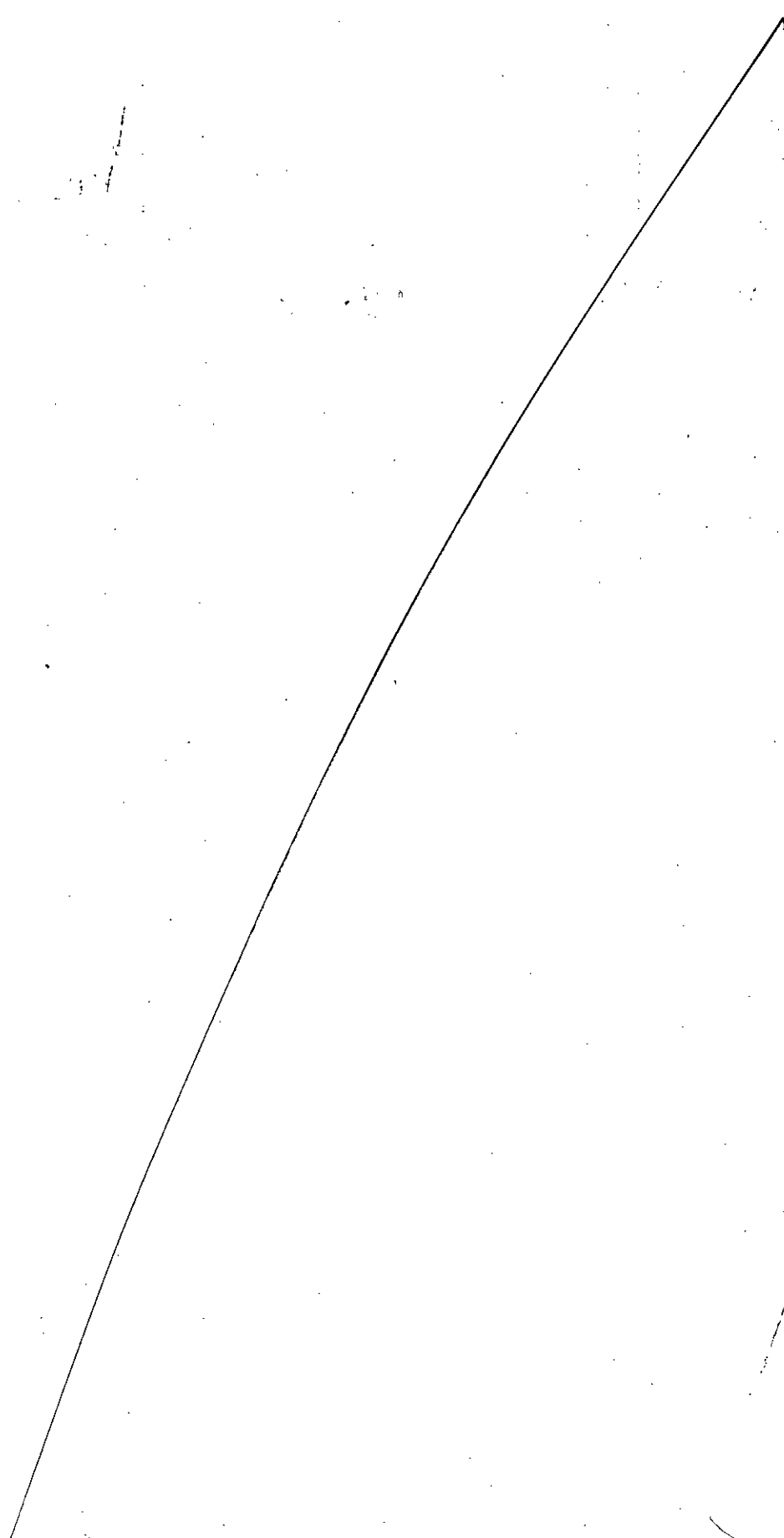

Member (J)

31.03.2020

Due to public holiday on account of COVID-19, the case is adjourned for the same on 22.06.2020 before S.B.



Reader


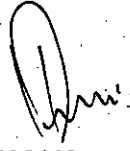

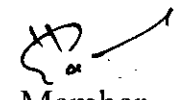


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1767/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/12/2019	<p>The appeal of Mr. Sabir Shah presented today by Syed Mudasir Pirzada 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 12/12/19</p>
2-	13/12/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>17/01/20</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	17.01.2020	<p>Nemo for appellant.</p> <p>Notices be issued to appellant/counsel for preliminary hearing on 14.02.2020 before S.B.</p> <p style="text-align: right;"> Chairman</p>
	13.02.2020	<p>Learned counsel for the appellant present and seeks adjournment. Adjourn. To come up for preliminary hearing on 30.03.2020 before S.B.</p> <p style="text-align: right;"> Member</p>

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. _____/ST

Dated _____/2021

To

The District Police Officer,
Government of Khyber Pakhtunkhwa,
Kohat.

Subject: -

JUDGMENT IN APPEAL NO. 1767/2019, MR. SABIR SHAH & 1 OTHER.

I am directed to forward herewith a certified copy of Judgement dated 22.06.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal 1767 2019

Sabir Shah Ex-Police Constable Kohat Belt No-89 R/O Near Kohat Cantt.

(Appellant)

VERSUS

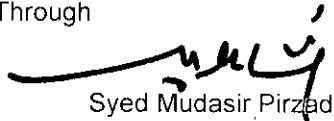
1. INSPECTOR GENERAL OF POLICE KPK PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT. (Respondent)

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	WakalatNama		


Appellant

Through


Syed Mudasir Pirzada
Advocate P H C
0345-9645854

Date 12/12/19

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Appeal no. 1767/2019

Sabir Shah Ex-Police Constable Kohat Belt No-89 R/O Near Kohat Cantt

(Appellant)

VERSUS

**Khyber Pakhtunkhwa
Service Tribunal**

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

Diary No. 1259
Dated 12/12/2019

(Respondent)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 25-09-2019 VIDE OB-NO-1180 IN WHICH THE RESPONDENT NO-3 DIRECTLY AWARD THE MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE WITHOUT ANY LAWFUL JUSTIFICATION WITHOUT ANY ENQUIRY AND THE APPELLANT PREFERRED DEPARTMENTAL REPRESENTATION DATED 22-10-2019 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 that the appellant had contact with notorious Proclaimed Offender group wanted in numerous crimes including target killing of four police officers .on midnight of 20/21Sep 2019 and police raid was planned on the aboard of proclaimed offender .

That the other allegation mentioned in the impugned order the appellant provided information to gang due to which operation secrecy was leaked by the appellant due to which loss of force operating in that raid.

That due to the above allegation the appellant was awarded served with charge sheet which were replied by the appellant but on the same day the respondent No-3 award major punishment of dismissal from service with immediate effect (Copy of Charge sheet and reply and impugned order is annexed as annexure A)

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 but without keeping the service record of the appellant blessed with the impugned order

PHOTO-DAY
REGISTERED
12/12/19

directly appellant feeling aggrieved and prefer departmental representation which was too rejected (Copy of representation and rejection order is annexed as annexure B)

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 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 more over the appellant was not served with the final show cause notice then how it is possible that the appellant relied on reply of so called charge sheet.
2. That the appellant was summoned by respondent No-3 and directly issued charge sheet and with one hour respondent No-3 order for submission of reply to charge sheet and still not issued the copy of charge sheet despite of tendering application for copies but in vain.(Copy of application is annexed as annexure D)
3. That nothing has been proved beyond any shadow of doubt that the appellant has committed any misconduct or tarnished the image of Police department.
4. 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.
5. 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.
6. That the appellant dragged unnecessarily into litigation which is clearly mentioned in 2008 SCMR 725.
7. 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.
8. That the appellant never ever admit before any forum regarding any admittance of alleged guilt.
9. That no CDR data prior to the raid or after the raid has not been obtain to prove the allegation against the appellant for any misconduct or leaked the information even no proof is available on record which speaks about the guilt of the appellant.
10. That if the appellant had leaked any information regarding police raid then how it is possible that accused were apprehended by police in the raid .

11. That the appellant has been charged also in case FIR No 478 dated 20-09-2019 U/s 118 Police Act 2017 and according to rules criminal proceedings shall be initiated after approval is accorded in writing by Head of District Police etc but in case of appellant there is no approval available on file and the appellant has been discharged by prosecution in above case which clearly shows that appellant has been twice vexed. (Copy of FIR and Discharge is annexed as annexure C)

12. That the appellant is feeling aggrieved from the impugned order hence preferred instant 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 nor any police official record the statement 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.
- e. That it is evident from all the departmental proceedings that no show cause notice nor any final show cause notice were served nor any proper departmental enquiry has been conducted and these material facts shall be a gaited at the time of arguments .
- f. That as per universal declaration of human rights 1948 prohibits the arbitral / discretion .
- g. That the respondent No-3 has acted whimsically and arbitrary, which is apparent from the impugned order.
- h. 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.
- i. That the departmental enquiry was not conducted according to the rules.
- j. That the impugned order is outcome of surmises and conjecture.
- k. That proper rule have not been observed while awarding the major punishment .

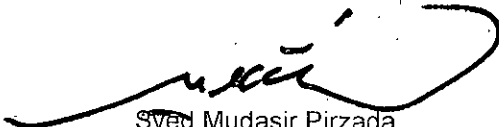
Pray:

In the view of above circumstances it is humbly prayed that the impugned order of punishment awarded by Respondent No. 3 may graciously please be set aside for the end of justice and the appellant may please be graciously re-instate and blessed with all back benefits for the end of justice .


Appellant

Through

Date 12 / 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.

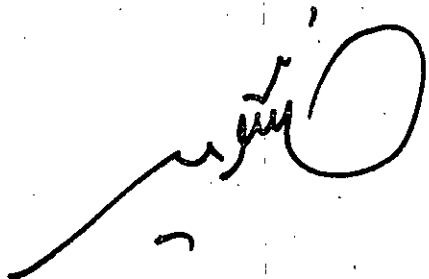
List of Books

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

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.



BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Sabir Shah Ex-Police Constable Kohat Belt No-89 R/O Near Kohat Cantt

(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 :-

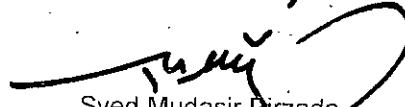
Sabir Shah Ex-Police Constable Kohat Belt No-89 R/O Near Kohat Cantt

RESPONDENTS

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


Appellant

Through


Syed Mudasir Pirzada
Advocate.PHC
0345-9645854

Date 12/12/19



Annexure A
P. 7

Office of the
District Police Officer,
Kohat

No. 22039-40/PA

Attest

Dated 21-9-2019

DISCIPLINARY ACTION

I, **CAPT @ WAHID MEHMOOD, DISTRICT POLICE OFFICER, KOHAT** as competent authority, am of the opinion that you **Constable Sabir No. 89** 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

1. *You constable Sabir No. 89 leaked the information to Anwar group Sumari about raid plan of Jarma Police Station. Your this act show professional gross misconduct on your part.*

2. For the purpose of scrutinizing the conduct of said accused with reference to the above allegations **SP Operations 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. 22039-40/PA, dated 21-9-2019.

Copy of above to:-

1. **SP Operations 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.

جواب خارج سب سے

8

جواب عالی
سوال خارج سب سے

التبیین نمبر 40 - 22039 خرچ 9/21/19

سائل کے خلاف الزم لگایا گیا ہے۔ کہ میں سائل نے لوہس
لگا کر حجام حرمہ کے بارے میں خفیہ معلومات اور
شروع ساری کو نبھالی۔

جواب عالی
میں سائل کے خلاف مذکورہ الزام حقیقت
پر مبنی ہے۔ "اور شروع حجامے میں سائل 140

صاحب کے ساتھ شریک تھا۔ مذکورہ حجامے میں اور شروع
ملا کہ مذکورہ حجامے کے حوالے سے اہل حق
میں سائل نے ایدو الین میں مزاج کو اللہ کی عیوب کو
یہ گرفتار ہوا نا جس کے حق۔ حرام کی گرفتار ہوا اس
ساتھ کا نا قابل شروع ہے۔ کہ میں سائل نے کہی
تسمیہ کہ ایدو الین اللہ ثابت تھا کہ زان مزاج کو
نہ دیا ہے۔ اہم اس قسم کے صحیح اور غیر قانونی
فصل کا شروع ہے جس سے سب سے

جواب عالی
میں سائل کے خلاف عائد شدہ الزام
مسترد اور مسترد ہے۔ کہ میں اس میں نہ واقعہ نہ ہے

عالم صادر فرما جاو - جن سائنس تيار ليا - وعالم

اور بلندي امثال كوله وعالم رسته جا -

25 9
19

ولعنه

صاير شاه 89 تنف نام حبره صلح كور

F. J. Jini



11

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

ORDER

This order will dispose of departmental proceedings conducted against constable Sabir Shah No. 89, (**hereinafter called accused official**) of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

Facts arising of the case are that the accused official had contacts with notorious Proclaimed Offender group wanted in numerous heinous crimes including target killing of 04 Police officers. On midnight of 20th /21st Sep: 2019, Police raid was planned on the aboard of Proclaimed offenders. The accused official being member of a disciplined force provided information to the gang, due to which the operation secrecy was leaked by him willfully to the loss of the force operating in that raid.

For the above, serious / professional misconduct of the accused official, charge sheet alongwith statement of allegations was served upon the accused official. SP Operations Kohat was appointed as enquiry officer to scrutinize the conduct of accused official. The Enquiry officer vide his report established contact of accused official with PO Anwar gang on the eventful day the accused official was held guilty of the charge leveled against him.

In view of the above, the accused official was served with Final Show Cause Notice to which he submitted reply but he did not advance any defense and relied on his reply to the charge sheet.

The accused official was heard in person in Orderly Room held on 25.09.2019 and afforded opportunity of defense but he failed to submit any plausible explanation. However the accused official admitted that he had contacted PO Anwar Hayat family for provision of clothes etc to the arrested accused after the raid.

I have gone through the available record and finding of the enquiry officer, which transpires that the accused official had contacts with the notorious most wanted POs gang and provided them information regarding Police legal action. The misconduct of the accused official was confirmed from other sources as well. Besides above, a case vide FIR No. 478 dated 23.09.2019 U/Ss 216 PPC , 118 Police Act – 2017 PS Jarma has also been register against the accuse official.

From the above, I have reached to the conclusion that the accused official being member of a disciplined force had relation with notorious PO gang and leaked information to facilitate the target killers, thus held guilty of violation duty and committed gross professional misconduct. His retention in Police department is most dangerous to the lives of Police personnel and any serious mishap could not be ruled out. The charge leveled against the accused official has been established beyond any shadow of doubt.

19/9
26-9-19
جیل
وکیل
انڈسٹری
رہبر سلطان
کمیونٹی
ڈسٹرکٹ پولیس

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12

Therefore, in exercise of powers conferred upon me under the ibid. rules I, Capt. @ Wahid Mehmood, District Police Officer, Kohat impose a major punishment of **dismissal** from service on accused constable Sabir Shah No. 89 with immediate effect. **Kit etc issued be collected**

Announced
25.09.2019


DISTRICT POLICE OFFICER,
KOHAT 25/9

OB No. 1180
Dated 25.09.2019

No. 24027-31/PA dated Kohat the 25-9- 2019.

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

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


DISTRICT POLICE OFFICER,
KOHAT 25/9

Annexure B
P-13

BEFORE THE DEPUTY INSPECTOR GENERAL OF POLICE KOHAT
REGION KOHAT.

SUBJECT: APPEAL AGAINST THE IMPUGNED ORDER VIDE O.B NO 1180 DATED 25-09-2019, UPON THE FINDINGS OF THE ENQUIRY OFFICER IN (SUMMARY PROCEEDINGS) AGAINST THE APPELLANT AWARDED MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE WITH IMMEDIATE EFFECT.

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 that the appellant had contact with notorious Proclaimed Offender group wanted in numerous crimes including target killing of four police officers on midnight of 20/21 Sep 2019 and police raid was planned on the aboard of proclaimed offender.

That the other allegation mentioned in the impugned order the appellant provided information to gang due to which operation secrecy was leaked by the appellant due to which loss of force operating in that raid.

That due to the above allegation the appellant was awarded major punishment of dismissal from service with immediate effect (Copy of impugned order is annexed.)

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.

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 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 no CDR data prior to the raid or after the raid has not been obtain to prove the allegation against the appellant for any misconduct or leaked the information .
9. That if the appellant had leaked any information regarding police raid then how it is possible that accused were apprehended by police in the raid .
10. That the appellant has been charged also in case FIR No 478 dated U/s 118/216 Police station and twice vexed.
11. That the appellant is feeling aggrieved from the impugned order hence preferred departmental representation 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.

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- 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.
- e. That as per universal declaration of human rights 1948 prohibits the arbitral / discretion.
- f. That the DPO Kohat 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 .

Pray:

In the view of above circumstances it is humbly prayed that the impugned order of DPO Kohat may please be set aside for the end of justice and the appellant may please be graciously be re-instate in service with all back benefits.

Date: 22/10/2019.

(Appellant)


(Ex Constable Sabir Shah
Belt No:-89)

POLICE DEPTT:

KOHAT REGION

16

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ORDER.

This order will dispose of a departmental appeal, moved by Ex-Constable Sabir Shah No. 89 Operation Staff Kohat against the punishment order, passed by DPO Kohat vide OB No. 1180, dated 25.09.2019 whereby he was awarded major punishment of dismissal from service for the allegations of establishing links with most notorious gang of Sumari Bala and providing secret information to them regarding conducting of raid etc.

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**

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

No. 10841- /EC, dated Kohat the 26/11- /2019.

Copy to District Police Officer, Kohat for information w/r to his office Letter No. 19297/LB, dated 29.10.2019. His Service Roll & Fauji Missal is returned herewith.

DSP/L + SP/OTHC

Handwritten notes and signature

27/11/19



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

کاروائی انور گروپ کے بابت جملہ انفارمیشن بذریعہ ذاتی روابط اور اخبارات
 محرم اشہاری کو دی گئی ہے دونوں نسلان مذکورہ خطرناک محراز اشہاری اور حیات
 سماری گروپ کی ہر قسم کی امداد اور جائز گھرناری سے بچانے کی ہر ممکن کوشش کر رہے
 صاحبہ 89 نسل مذکورہ کے خلاف قبل ازین رپورٹ لکھا ہے اور یہ بھی حوالہ دیا
 ہے فورسز کے مدد سے بھی لیا جاتا ہے دونوں نسلان کے خلاف ہر ممکن کوشش
 کاروائی کر کے بھی خاطر رپورٹ درج روزنامہ پبلکر کے مراد مناسبت حکم افزاں والا
 صاحبان کو ارمان لیا جاتا ہے رہنمائی حاصل کرنے کے بعد کاروائی عمل میں لائی
 3 حاتی نئی جنان عالی نقل عطا تھی اصل ہے

S. H. O. P. Jammu
 23-09-2019

میں نے اس بارے میں جاننا چاہتا ہوں کہ کیا یہ سب کچھ سچ ہے یا نہیں ہے
 اگر سچ ہے تو اس کی تصدیق کرنے کے لیے اس شخص کو پھانسی دینا چاہیے
 اور اس کے ساتھ ساتھ اس کے تمام رشتہ داروں کو بھی پھانسی دینا چاہیے
 تاکہ یہ سب کچھ دوبارہ نہ ہو سکے اور اس کی مثال نہ بن سکے
 اور اس کے ساتھ ساتھ اس کے تمام رشتہ داروں کو بھی پھانسی دینا چاہیے
 تاکہ یہ سب کچھ دوبارہ نہ ہو سکے اور اس کی مثال نہ بن سکے
 اور اس کے ساتھ ساتھ اس کے تمام رشتہ داروں کو بھی پھانسی دینا چاہیے
 تاکہ یہ سب کچھ دوبارہ نہ ہو سکے اور اس کی مثال نہ بن سکے

اطلاع کے لیے اطلاع دہندہ کا خط ہو گا یا اس کی ہر نشان نکال جائے گا اور اس پر زور رکھنا ہے کہ اطلاع کا خط بطور
 ایک مرموز ہشتہریں الرتیب رائے باشندگان بنانہ میرا وسط ایشیا یا افغانستان میں موزوں ہوں لکھا جائے۔
 اور اس کے ساتھ ساتھ اس کے تمام رشتہ داروں کو بھی پھانسی دینا چاہیے
 تاکہ یہ سب کچھ دوبارہ نہ ہو سکے اور اس کی مثال نہ بن سکے



DISTRICT PUBLIC PROSECUTOR OFFICE,
KOHAT

Phone & Fax # 0922-9260282

E-mail: kohatdpp@gmail.com

To

The Learned Trial Court,
Kohat

18

Sheweth

State.....VS..... Sabir & others

FIR No. 478, dated 23.09.2019, u/s 118 police Act 2017 / 216PPC,

PS: Jarma

Subject: APPLICATION FOR THE DISCHARGE OF THE CASE U/S 4C(II) OF THE KHYBER PAKHTUNKHWA PROSECUTION SERVICE (CONSTITUTION, FUNCTION AND POWERS) ACT, 2005 READ WITH SECTION 494 CR.PC ON THE BASIS OF LACKING OF EVIDENCE AGAINST THE ACCUSED

Respectfully Sheweth

Grounds for discharge of the accused:

1. That the SHO of PS Jarma was reported in the shape of Naqal Mad No. 24 dated 21.09.2019 that the constable Sabir, who is posted as a constable at PS Jarma and he informed the PO namely Anwar Hayat through mobile phone, who is required in different criminal cases to the police.
2. That there is no evidence available on file, which could connect the accused with the commission of the offence.
3. That there is no CDR data available on file.
4. That there is no source disclosed by the concerned police official regarding help of the PO.
5. That there is no forensic audit report annexed with the case file up till now despite directions were issued to the I.O.
6. That as per section 118 of police Act 2017, criminal proceeding shall be initiated after approval is accorded in writing by Head of District police etc and there is no written approval available on file.
7. That there is no probability of the conviction of the accused in the instant case on the basis of available evidence.
8. That the trial of the case of the above noted accused will be futile exercise / wastage of precious time of the Honourable court.

Therefore, in view of the above factual position, this case is completely lacking of evidence so as to substantiate the charges against the accused, thus, this case is not fit for prosecution and the same may be discharged.

[Signature]
Assistant Public Prosecutor
Kohat
(Mr. Nisar A.P.P.)

[Signature]
9/12/2019
DPP Kohat
DISTRICT Public Prosecutor
Kohat.

کتابخانه ضیا — DPo ضیا دہلی

Annexure D
ضیا دہلی P-19

لڈا رکن سے درج شدہ ضیا دہلی ضیا دہلی
89
منہ سٹیج کے لئے جاری شدہ
دہلی ضیا دہلی

لڈا رکن سے درج شدہ ضیا دہلی ضیا دہلی

ادرسال ضیا دہلی

19
11/12
ضیا دہلی ضیا دہلی



2306

ایڈوکیٹ اسٹنٹ: شیر علی
 بار کونسل ابار ایسوسی ایشن نمبر: bc-09-1869
 رابطہ نمبر: 0345-9645856

کوہاٹ بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: PK سید شہباز

دعویٰ: <u>سید شہباز</u>	منجانب: <u>امداد شاہ</u>
علت نمبر: <u>1</u>	<u>صاحبزادہ</u> <u>بنام</u> <u>PK-12/12/19</u>
مورخہ:	
تھانہ:	

باعت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام لنار کیلئے سید شہباز و امداد شاہ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی نکل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریبات 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 کارروائی 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 پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے۔

المرقوم 12/12/19
سید شہباز گواہ شد امداد شاہ

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1767/2019
Sabir Shah Ex-Constable No. 89

..... Appellant

VERSUS

Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar and others

..... Respondents

PARAWISE COMMENTS BY RESPONDENTS.

Respectively Sheweth:-

Preliminary Objections:-

- i. That the appellant has got no cause of action.
- ii. The appellant has got no locus standi.
- iii. The appellant is estopped to file the present appeal due his own act.
- iv. That the appellant has not come to this Hon: Tribunal with clean hands.
- i. That the appeal is bad in eyes of law as, his revision petition was rejected by respondent No. 1 and the appellant has not questioned the said order. Copy annexed.

FACTS:-

On 20.05.2017, 04 Police officers were martyred by notorious proclaimed offenders vide FIR No. 9 dated 20.05.2017 u/ss 302, 324, 353, 427, 148, 149, 34 PPC, 15AA, 7ATA, Police station CTD Kohat Region. Their arrest was a challenge to Police. On the midnight of 20th / 21st September 2019, Police planned operation / raid at the abodes of notorious proclaimed offenders / target killers. The appellant having links with the notorious disclosed secrecy of Police plan and provided information to the gang. Due to which the operation could not be succeeded. Thus the appellant being member of a disciplined department had committed a gross professional misconduct and exhibited himself as untrustworthy. Copies of FIR and daily diary are **annexure A & B**.

Reply is submitted in the above para.

The appellant was served with charge sheet alongwith statement of allegations under the relevant rules and SP Operation Kohat was appointed as inquiry officer, who held him guilty of the charge after conducting proper inquiry.

After fulfilling all codal formalities including personal hearing of the appellant, the appellant was awarded punishment commensurate to the charge by respondent No. 3 as the charge was established against the appellant beyond any shadow of doubt during proper departmental proceedings.

Incorrect, the appellant being member of a disciplined department had committed gross misconduct and exhibited himself inefficient and untrustworthy as well which was established against the appellant. The departmental representation being devoid of merits was correctly rejected by respondent No. 2. It is added that revision petition of the appellant was also rejected by respondent No. 2 vide order dated 27.07.2020, which is not challenged by the appellant in the instant service appeal.

Incorrect, the appellant was associated with the inquiry proceedings, afforded ample opportunity of defense and heard in person by the respondent as evident from the impugned orders, but the appellant failed to submit any plausible explanation to his misconduct / defend himself.

1. Incorrect, the charge leveled against the appellant was established proper departmental proceedings. Furthermore, the appellant was served with final show cause notice, to which his reply was found unsatisfactory by respondent No. 3. Copies are **annexure C & D**.
2. Incorrect, the appellant was proceeded with departmentally in accordance with the relevant rules. He was served with charge sheet to which the appellant filed reply as annexure A of the appeal. The application annexure D described by the appellant in his appeal is not filed to the respondent No. 3 and incorrect as submitted above. It is added that the appellant had filed application for grant of copies which was provided to him accordingly. Copy is **annexure E**.
3. Incorrect, detail reply is submitted in preceding paras.
4. Incorrect, the appellant submitted false statement in para No. 4 of the appeal, as the appellant did not earn any good entry in his credit during his service.
5. Incorrect, the appellant was associated with the inquiry proceedings, heard in person during disposal of inquiry and hearing of his departmental appeal / revision petition, but failed to submit any plausible explanation to his gross professional misconduct established against him during proper departmental proceedings.
6. Incorrect, the appellant was proceeded with departmentally for his own conduct. Furthermore, regarding the case referred by the appellant, it is submitted that each and every case has its own facts and merits. Therefore,

- the reference is not relevant. It added the appellant was also charged in case FIR No. 478 dated 23.09.2019 u/ss 216 PPC, r/w 118 KP Police Act 2017.
7. Incorrect, all the codal formalities were fulfilled during the course of departmental proceedings.
 8. The charge leveled against the appellant was established by the inquiry officer, competent authority and appellate authorities vide their legal and reasonable orders.
 9. There was credible information regarding leakage of Police operation plan by appellant as, detailed in daily diary No. 7 dated 23.09.2019, annexure B. He might have used other source for providing information to the notorious POs as he knew that his cell data will be verified / collected in case of his apprehension.
 10. The Police operation against notorious POs gang was not succeeded as the notorious POs wanted in FIR No. annexure A have made their good escape before arrival of raiding party.
 11. Incorrect, the criminal and departmental proceedings can run side by side and there is no legal restriction as the appellant had also committed a criminal act, besides professional misconduct. Furthermore, discussion on criminal case on legal point relates to trial court and beyond the jurisdiction of this honorable Tribunal.
 12. The appellant is estopped to file the instant appeal for his own act / conduct.

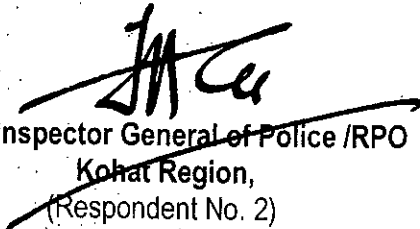
Grounds:-


- a. Incorrect, the matter is not related to general public to whom examination was required during inquiry. However, the concerned Police officials were examined during the course of inquiry proceedings.
- b. Incorrect, the appellant was served with charge sheet / statement of allegations and final show cause notice to which he submitted replies, joined the inquiry proceedings and personally heard by the respondents.
- c. Incorrect, the punishment imposed on the appellant is commensurate to the charges established against him.
- d. Incorrect, the appellant had committed a gross professional misconduct and exhibited himself inefficient / untrustworthy official.
- e. Incorrect, the appellant submitted false statement in para e of the grounds of his appeal as the legal proceedings were followed and he was served with final show cause notice to which he submitted reply. Copies already **annexed as C & D.**
- f. Incorrect, the appellant was dealt with departmentally under the relevant rules and no human rights were violated by the respondents on any way.
- g. Incorrect, all the departmental proceedings were conducted in accordance with the relevant rules.

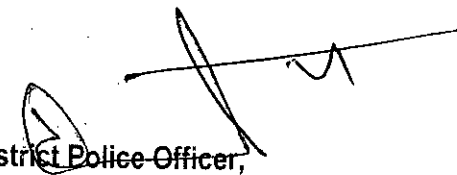
- h. Incorrect, speaking and legal orders were passed by the respondents.
- i. Incorrect, as replied in the above paras, the departmental proceedings were conducted against the appellant in accordance with relevant / existing rules.
- j. Incorrect, as replied earlier, legal and speaking orders are passed by the respondents.
- k. Incorrect, reply has been submitted in the above paras.

Prayer:-

In view of the above, it is prayed that the appeal of the appellant is not maintainable, may graciously kindly be dismissed with costs.


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


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


District Police Officer,
Kohat
(Respondent No. 3)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1767/2019
Sabir Shah Ex-Constable No. 89

..... Appellant


VERSUS


Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar and others

..... Respondents

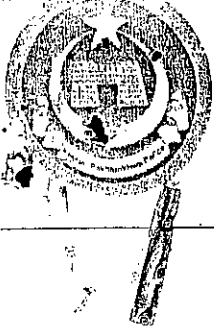
COUNTER AFFIDAVIT

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


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


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


District Police Officer,
Kohat
(Respondent No. 3)



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

No. S/ 2979 /20, dated Peshawar the 27/7/2020

By No. 56006
27/7/20

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by Ex-FC Sabir Shah No. 89. The petitioner was dismissed from service by District Police Officer, Kohat vide OB No. 1180, dated 25.09.2019 on the allegations that he had contacts with notorious proclaimed offender group wanted in numerous heinous crimes including target killing of 04 Police officers. On midnight of 20th/21st September, 2019, Police raid was planned on the aboard of proclaimed offenders. He provided information to the gang, due to which the operation secrecy was leaked. Besides above, a case vide FIR No. 478, dated 23.09.2019 U/Ss 216 PPC, 118 Police Act-2017 Police Station Jarma was also registered. His appeal was rejected by Regional Police Officer, Kohat vide order Endst: No. 10841/EC, dated 26.11.2019.

Meeting of Appellate Board was held on 09.07.2020 wherein petitioner was heard in person. During hearing petitioner denied the allegations leveled against him.

Serious allegations of having contacts with notorious proclaimed offender group wanted in numerous heinous crimes including target killing of 04 Police officers has been leveled against him. His retention in Police department is most dangerous to the lives of Police personnel and any serious mishap could not be ruled out. Therefore, the Board decided that his petition is hereby rejected.

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

EC
29/7

Sd/-

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

OFFICE OF THE DISTRICT POLICE
4206
10/8/20

No. S/ 2980-89 /20,

Copy of the above is forwarded to the:

8378 /EC
27/8/20

1. Regional Police Officer, Kohat. One Service Roll and one Fauji Missal/Enquiry file of the above named Ex-FC received vide your office Memo: No. 2801/EC, dated 20.02.2020 is returned herewith for your office record.
2. District Police Officer, Kohat.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. PA to AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV CPO Peshawar.

Seen / DPO Kohat

For information & in form the appellant concerned, one S/Roll + F/Missal/Enq: File is returned herewith.

11

SRA/20/20
for 29/7/2020
[Signature]
27/7/20

DIG POLICE
(KASHIF ZULFIQAR) PSP/KOHA
AIG/Establishment.
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

خدمت جناب ٹی بی ایاز ایس ایچ اے نقولہ پورہ

دفعہ ۱۵۷ پر عمل درآمد
۱۵۷-۱۵۷ دفعہ

۸۹ - ۸۹
شاہ محمد علی شاہ ۹۸۵

صاحبزادہ شاہ محمد علی شاہ صاحبزادہ

فادر نوہ گانہ لائن کورس پولیس سٹیشن اور فادر نوہ حدیث
۱۵۷-۱۵۷ دفعہ شاہ محمد علی شاہ - اریب نے ۱۵۷-۱۵۷
کوریج کر لیا گیا ہے وہ بھی فادر نوہ کورس
۱۵۷-۱۵۷ دفعہ شاہ محمد علی شاہ

۱۹-۱۲-۲۰۱۹
3-12-19

DISMISS اور جوہ ۱۵۷-۱۵۷ دفعہ

۱۵۷-۱۵۷ دفعہ نقولہ پورہ اور ۱۵۷-۱۵۷ دفعہ
۱۵۷-۱۵۷ دفعہ شاہ محمد علی شاہ ۰۳۳۲۹۷۵۴۸۱۶

۱۵۷-۱۵۷ دفعہ شاہ محمد علی شاہ ۰۳۳۳۳۱۴۱۵۱۷
دفعہ ۱۵۷-۱۵۷ دفعہ شاہ محمد علی شاہ

۱۵۷-۱۵۷ دفعہ شاہ محمد علی شاہ
۱۵۷-۱۵۷ دفعہ شاہ محمد علی شاہ

POLICE DEPTT:

KOHAT REGION

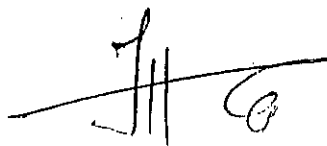
ORDER

This order will dispose of a departmental appeal, moved by Ex-Constable Sabir Shah No. 89 Operation Staff Kohat against the punishment order, passed by DPO Kohat vide OB No. 1180, dated 25.09.2019 whereby he was awarded major punishment of dismissal from service for the allegations of establishing links with most notorious gang of Sumari Bala and providing secret information to them regarding conducting of raid etc.

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



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

No. 10841- /EC, dated Kohat the 26/11- /2019.

Copy to District Police Officer, Kohat for information w/r to his office Letter No. 19297/LB, dated 29.10.2019. His Service Roll & Fauji Missal is returned herewith.

DCP/EC + SR/CP/OTHC
27/11/19

OFFICE OF THE DISTRICT POLICE OFFICER
KOHAT
9555
28/11/19


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

بھنور جناب ڈسٹرکٹ پولیس آفیسر صاحب کوہاٹ

درخواست بمراء عطائیگی مصدقہ نقولات سالم ڈسمسل آرڈر کنسٹبل نمبر 89 صابر شاہ

جناب عالی:

سائل ذیل گزارش کرتا ہے۔

- ۱۔ یہ کہ سائل کنسٹبل نمبر 89 صابر شاہ کا ڈسمسل آرڈر آپ صاحب کی دفتر سے جاری ہو چکا ہے۔
- ۲۔ یہ کہ سائل برائے ریکارڈ خود جملہ فائیل بمع ڈسمسل آرڈر کے مصدقہ نقولات حاصل کرنا چاہتا ہے۔

لہذا استدعا ہے کہ متعلقہ حکام کو اس بابت ضروری ہدایات جاری فرما کر مشکور فرمائے۔

نقطہ: 27.09.2019

سائل:

سابقہ نمبر 89 کنسٹبل صابر شاہ ولد پیاؤ الدین سکندہ درملک تحصیل لاپچی ضلع کوہاٹ

موبائل: 0345-3297772

Jinu

جناب عالی!

کانسٹبل فزوارہ فزوالہ 1181 OB 25-9-19 478

فونم 23-9-19 فزوارہ 1181-1181 فزوارہ فزوارہ فزوارہ

فونم فزوارہ ڈسمسل فزوارہ فزوارہ فزوارہ فزوارہ

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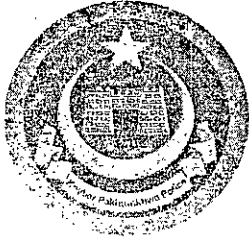
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OFFICE OF THE
DISTRICT POLICE OFFICER,
KOHAT
Tel: 0922-9260116 Fax 9260125

ORDER

This order will dispose of departmental proceedings conducted against constable Sabir Shah No. 89, (**hereinafter called accused official**) of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

Facts arising of the case are that the accused official had contacts with notorious Proclaimed Offender group wanted in numerous heinous crimes **including target killing of 04 Police officers**. On midnight of 20th /21st Sep: 2019, Police raid was planned on the aboard of Proclaimed offenders. The accused official being member of a disciplined force provided information to the gang, due to which the operation secrecy was leaked by him willfully to the loss of the force operating in that raid.

For the above, serious / professional misconduct of the accused official, charge sheet alongwith statement of allegations was served upon the accused official. SP Operations Kohat was appointed as enquiry officer to scrutinize the conduct of accused official. The Enquiry officer vide his report established contact of accused official with PO Anwar gang on the eventful day the accused official was held guilty of the charge leveled against him.

In view of the above, the accused official was served with Final Show Cause Notice to which he submitted reply but he did not advance any defense and relied on his reply to the charge sheet.

The accused official was heard in person in Orderly Room held on 25.09.2019 and afforded opportunity of defense but he failed to submit any plausible explanation. However the accused official admitted that he had contacted PO Anwar Hayat family for provision of clothes etc to the arrested accused after the raid.

I have gone through the available record and finding of the enquiry officer, which transpires that the accused official had contacts with the notorious most wanted POs gang and provided them information regarding Police legal action. The misconduct of the accused official was confirmed from other sources as well. Besides above, a case vide FIR No. 478 dated 23.09.2019 U/Ss 216 PPC , 118 Police Act – 2017 PS Jarma has also been register against the accuse official.

From the above, I have reached to the conclusion that the accused official being member of a disciplined force had relation with notorious PO gang and leaked information to facilitate the target killers, thus held guilty of violation duty and committed gross professional misconduct. His retention in Police department is most dangerous to the lives of Police personnel and any serious mishap could not be ruled out. The charge leveled against the accused official has been established beyond any shadow of doubt.

26-9-19

حیدر

ولیدی

انڈسٹری

دستخط

دستخط

دستخط

Therefore, in exercise of powers conferred upon me under the ibid rules I, Capt. @ Wahid Mehmood, District Police Officer, Kohat impose a major punishment of **dismissal** from service on accused constable Sabir Shah No. 89 with immediate effect. **Kit etc issued be collected**

Announced
25.09.2019


DISTRICT POLICE OFFICER,
KOHAT 25/9

OB No. 1180
Dated 25.09.2019

No. 24027-31/PA dated Kohat the 25-9- 2019.

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

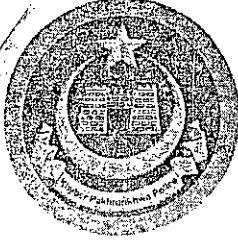
1. Regional Police Officer, Kohat please
2. Reader/Pay officer/SRC/OHC for necessary action.
3. R.I/L.O for clearance report


DISTRICT POLICE OFFICER,
KOHAT 25/9

صالح علی

حوالہ مافیہ شکر توفیق عسری ۱۰۸
۲۵۹۹
۲۵۹۹
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۲۵۹۹



OFFICE OF THE
DISTRICT POLICE OFFICER,
KOHAT

Tel: 0922-9260116 Fax 9260125

No 24018 /PA dated Kohat the 25/9 /2019

FINAL SHOW CAUSE NOTICE

1. 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 Sabir No. 89** 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. 22039-40/PA dated 21.09.2019.
- 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. **You constable Sabir No. 89 leaked the information to Anwar group Sumari about raid plan of Jarma Police Station. Your this act show professional gross misconduct on your part.**

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

3. You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you also intimate whether you desire to be heard in person.

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

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


DISTRICT POLICE OFFICER,
KOHAT



INQUIRY REPORT AGAINST CONSTABLE SABIR NO.89

No. 963 /PA-Ops Kohat, the dated 25/09 /2019

INDINGS

This is in response of your good office Charge Sheet vide No.22039-40/PA dated 21.09.2019.

Constable Sabir No.89 was charge sheeted with the allegations below:-

You Constable Sabir No.89 leaked the information to Anwar group Sumari About raid plan of Jarma Police station. Your this act shows professional gross misconduct on your part.

For scrutinizing the conduct of enquiry he was summoned for personal hearing, recorded his statement and examined thoroughly. In his written reply of charge sheet and summary of allegations, he defended himself pleading his innocence. He stated that he was along with SHO in the raid and in the raid two personnel of Anwar group and one hide assassin was arrested. If he has had informed these accused then they never would have been arrested. He has no contact with Anwar group directly or indirectly. He has 13 years of service and never thought about such activities. He further added that he performed his duty with zeal and zest.

In this regard statement Of SHO PS Jarma was also recorded who disclosed that from CDR it was proved that Constable Sabir No.89 and father of Constable Shah Muhammad were in contact with Anwar Group resident of Sumari. SHO further added that Constable Sabir No.89 contacted from his personal Mobile No.0313-7340202 with Asghar Ali member of Anwar group resident of Sumari regarding police raid.

Statement of Moharrar PS Jarma Gulab Ali was also recorded who disclosed that Constable Sabir No.89 was seen busy on his mobile talking to someone. He further added that he does not know to whom he was talking on his mobile phone. (Statement of Moharrar PS Jarma is placed in the file for ready reference).

During the course of inquiry he was given complete legitimate opportunity to defend himself according to the law, rules and regulation. During enquiry the said Constable disclosed that police brought the accused namely Habib Ullah, Anwar Razeem and Rizwan to police station jarma. He further stated that the accused namely Habib Ullah, Anwar Razeem and Rizwan hail from the area where he resides. He made call to Asghar Ali member of Anwar group to make comfortable arrangement for them in the lock-up of PS jarma. He also revealed other secrets regarding police further action to them through mobile phone. It is proved that he has good relations with Anwar group and always revealing secret informations to them.

Hence found guilty and is recommended for suitable punishment.

Submitted please.

(TAHIR IOBAL)

Superintendent of Police,
Operations, Kohat



Office of the
District Police Officer,
Kohat

No 22039-40/PA

Dated 21-9-2019

CHARGE SHEET.

I, **CAPT @ WAHID MEHMOOD, DISTRICT POLICE OFFICER, KOHAT,** as competent authority under Khyber Pakhtunkhwa Police Rules (amendments 2014) 1975, am of the opinion that you **Constable Sabir No. 89** rendered yourself liable to be proceeded against, as you have committed the following act/omissions within the meaning of Rule 3 of the Police Rules 1975.

- i. ***You constable Sabir No. 89 leaked the information to Anwar group Sumari about raid plan of Jarma Police Station. Your this act show professional gross misconduct on your part.***

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

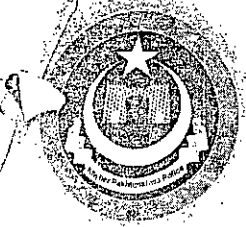
3. You are, therefore, required to submit your written statement within 07days of the receipt of this Charge Sheet to the enquiry officer.

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.

**DISTRICT POLICE OFFICER,
KOHAT**

*Received.
Tawees 2-PC
24-09-2019*



No 22039-40/PA

Office of the
District Police Officer,
Kohat

Dated 21-9- /2019

DISCIPLINARY ACTION

I, **CAPT ® WAHID MEHMOOD, DISTRICT POLICE OFFICER, KOHAT** as competent authority, am of the opinion that you **Constable Sabir No. 89** 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. ***You constable Sabir No. 89 leaked the information to Anwar group Sumari about raid plan of Jarma Police Station. Your this act show professional gross misconduct on your part.***

2. For the purpose of scrutinizing the conduct of said accused with reference to the above allegations **SP Operations 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 22039-40 /PA, dated 21-9- /2019.

Copy of above to:-

1. **SP Operations 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.

....

جواب خارج شد


جواب عالی ۱
حوالہ خارج شد

التبلیغ فی ۴۵ - ۲۲۰۳۹ حریف ۱۸۸ - ۱۹۱۹

سائل کے خلاف الزعم کا ثبوت ہے۔ کہ میں سائل نے لوٹس
لگا کر تمام حریف کے بارے میں خفیہ معلومات اور
گروپ ہماری کو نہائی۔

جواب عالی ۱
میں سائل کے خلاف مذکورہ الزعم حقیقت
پر مبنی ہے۔ "الوزیر گروپ" کے خفیہ
مجموعے میں سائل ۱۴۵

صاحب کے ساتھ شریک تھا۔ مذکورہ مجموعے میں الوزیر گروپ
کا ایک منہ صبح ڈیو ملتان آگئی قابل ترجمان ملے۔ اگر
میں سائل نے ایڈوائس میں ملتان کو الیڈی کی موبی۔ تو
یہ ترجمان مال نامہ ملے تھے۔ ملتان کی ترجمان مال اس
ساتھ کا ناقابل تردید ثبوت ہے۔ کہ میں سائل نے کئی
قسم کی ایڈوائس الیڈی ثابت تھا کہ زبان ملتان کو
نہ دی ہے۔ اعداء اس قسم کے تصحیح اور غیر قانونی
فصل کا مجموعہ میں نہیں سکتا۔


Superintendent of Police
Operation
Kohat

جواب عالی ۱
میں سائل کے خلاف عائد شدہ الزعم
مسترد اور مسترد ہے۔ کیونکہ اس میں نہ واقعہ نہ ہے

کہ میں سائل نے کتب مبینہ المدعیہ بلکہ ہم لہجہ لہجہ لہجہ
کو مبینہ المدعیہ انجالی - اور اس وقت اور اس وقت اور اس وقت
المدعیہ لہجہ لہجہ لہجہ

صائب عالی ا اور گروہ یا دوسرے مذاہم مزائد
گروہ بلکہ کے ساتھ میں سائل کا مذکورہ واسطہ اور
بالواسطہ لوگ تعلق ہے - اور نہ ہی ان سے کوئی حال
یا لہجہ ہے -

صائب عالی ا میں سائل کلمہ و سس تہہ سال ملکہ
حکمہ میں لکھا ہے - اور کہیں نہیں اس مقدمہ
واقعات میں مذکور ملکہ برآمد ہے - اور نہ ہی
ملکہ ہونے کا شروع نہیں کیا ہے - میں سائل
قانون نافذ کرنے والے ادارے سے تعلق ہے -
اور سلسلہ اپنے فرانس میں کسی کو دیگر معاملات پر غور
دی ہے - میں سائل کے حذف الراء حقیقت پر
نہی ہے - میں سائل ایسے لہجہ کے بارے میں
دیکھیں اور فرانس سے آپ صاحبان کی کتاب
کو تیار ہے - میں سائل کے حذف الراء حقیقت
میں مذکورہ کی حقیقت میں داخل حذف لہجہ

حکم صادر فرمایا جاوے۔ من سے تاملت دعا
اور بلدی امدال ککے دعا کرے گا۔

9
19

علین

مارشال 89 سے نام حسین فرید ککے



F. J. J.

Superintendent of Police
Operation
Kohat

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1

بیان اذان و سرگودھا کی تقانہ پھر

میں اس سرگودھا سے تعلق رکھتا ہوں کہ میں

کو کونسل ممبران 89 کا تیار تقانہ جلا ہے

کونسل تقانہ سے مختلف ڈیوٹیوں سر انجام دینا تھا

کیا تو وہاں سے فون ہو گیا تھا اکثر اوقات میرا فون

فون بیٹا چلتا رہا تھا بس یہ علم نہیں تھا کہ مذکورہ

کونسل کے لیے کیا تو بات کر رہا ہے مذکورہ کونسل کا

اصدق کتب تھا خصوصاً کتب وقت گزارنا تھا

میں 2 کو 5 صبح کو اہم اہم وقتوں میں فون ہوا تھا

میں نے مذکورہ کتب کو وہاں سے لایا

میں نے کتب کو 5 صبح کو لایا

23 رات کو 5 صبح کو لایا

کاروباری اوزار ہاں ہاں اور اس وقت تک

ہاں ہاں مذکورہ کتب کو لایا 478

23 118 216 216 216

Gulistan
25-9-19

77 نمبر

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قصار ہما

نقلہ 17 روزہ فیروزہ 23/19

فیروزہ

مدار لورین قسنت خان 440 کی فریم 23/19 وقت 15:00 بجے در حیدر آباد
اشتہاد کی گروپ کا سربراہ نور صیات ولد امان اللہ خان مسکن
سماری باباں بمبئی رید گروہ و طلبہ جو الہ مقدونہ است 25 فریم

12/17 و صیم 302/324 نقلہ لوری مقدونہ است 18 فریم 25/07 صیم
1340 مقدونہ است 135 فریم 14/07 صیم 355 نقلہ لوری است

14 فریم 28/07 صیم 1340 مقدونہ است 196 فریم 4/18
نقلہ لوری مقدونہ است 77 فریم 21/17 صیم 324-353

26/16 صیم 302/324 نقلہ لوری مقدونہ است 9 فریم 20/17 صیم
353 TATA نقلہ لوری

مدار لورین قسنت خان 440 کی فریم 23/19 وقت 15:00 بجے در حیدر آباد
اشتہاد کی گروپ کا سربراہ نور صیات ولد امان اللہ خان مسکن
سماری باباں بمبئی رید گروہ و طلبہ جو الہ مقدونہ است 25 فریم

مدار لورین قسنت خان 440 کی فریم 23/19 وقت 15:00 بجے در حیدر آباد
اشتہاد کی گروپ کا سربراہ نور صیات ولد امان اللہ خان مسکن
سماری باباں بمبئی رید گروہ و طلبہ جو الہ مقدونہ است 25 فریم

مدار لورین قسنت خان 440 کی فریم 23/19 وقت 15:00 بجے در حیدر آباد
اشتہاد کی گروپ کا سربراہ نور صیات ولد امان اللہ خان مسکن
سماری باباں بمبئی رید گروہ و طلبہ جو الہ مقدونہ است 25 فریم

مدار لورین قسنت خان 440 کی فریم 23/19 وقت 15:00 بجے در حیدر آباد
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سماری باباں بمبئی رید گروہ و طلبہ جو الہ مقدونہ است 25 فریم

مدار لورین قسنت خان 440 کی فریم 23/19 وقت 15:00 بجے در حیدر آباد
اشتہاد کی گروپ کا سربراہ نور صیات ولد امان اللہ خان مسکن
سماری باباں بمبئی رید گروہ و طلبہ جو الہ مقدونہ است 25 فریم

مدار لورین قسنت خان 440 کی فریم 23/19 وقت 15:00 بجے در حیدر آباد
اشتہاد کی گروپ کا سربراہ نور صیات ولد امان اللہ خان مسکن
سماری باباں بمبئی رید گروہ و طلبہ جو الہ مقدونہ است 25 فریم

Alshad

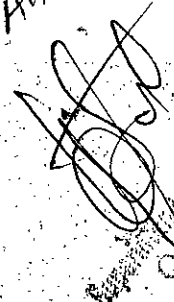
اور ہمارے 89 ٹینٹل فنانس جاس قبیل ازین کاروائی انور گروپ
 ہم انفارمیشن فراہم خانی و بائیل فون انور سارٹ قوم اسٹینڈ
 وگ ٹی ہے۔ دونوں سٹیڈین مذکورہ فطرتان و برمان اسٹیڈیاری
 ہمارے گروپ کی ہر ٹیم کی افراد اور جانر و قدراری سے جاننے کی ہر
 کو سٹینڈ کرتا ہے۔ ہمارے 89 ٹینٹل فٹورہ کے خلیف قبیل ازین رپورٹ
 لکھا ہے اور اسکا و بائیل کی فون سٹینڈ و سٹیم لکھ لیا جاتا ہے
 دونوں سٹیڈین گینڈف برٹے قانون کاروائی ازین کی خاطر رپورٹ
 ازینا و سٹور ہر و فنانس ہر علم ہر افران ہر لکھا جاتا ہے اور
 کتبنا ہے ازینا کی قانون کرنے کے بعد قانون کاروائی ازین سے
 لائی جاتی ہے

فی علیا

تیسری دفعہ اجلاس

23
 23
 17
 23

Attended

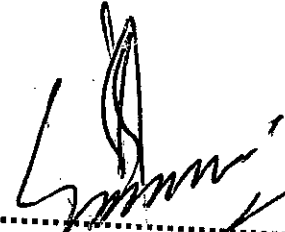


Operation
 Kohari

بیان ازان قسمت خان SHO تھانہ جرما

حلفاً بیان کرتا ہوں کہ بحوالہ مقدمہ علت نمبر 478 مورخہ 23.09.2019 جرم PPC-118/216 پولیس ایکٹ 2017 تھانہ جرما برخلاف کانسٹیبلان / ملزمان صابر 89 متعینہ جرما اور شاہ محمد 985 متعینہ نیو پولیس لائن گارڈ مین گیٹ کو ہاٹ درج رجسٹر ہو کر FIR میں نقل مد 17 روز نامچہ 23.09.2019 تھانہ جرما میں تفصیلاً رپورٹ میرا بیان ہے اس کے علاوہ تفتیشی سٹاف نے CDR بابت الزام حاصل کیا جا رہا ہے۔ کانسٹیبلان بالا پر الزامات CDR سے واضح طور پر ثابت ہوئے ہیں۔ مختصر یہ ہے کہ نامی گرامی مجرم اشتہاری انور حیات ولد آمان اللہ سکنہ ہماری پایاں موجودہ الوقت زیر استعمال نمبر 0333-9301653 پر کانسٹیبل صابر نے اصغر علی کے نام پر موبائل نمبر 0335-5882844 کو بعد اسکے کارندے گرفتاری پر اپنی ذاتی نمبر 0313-7340202 پر رابطہ کر کے انفارمیشن دی گئی۔ اسی طرح 0333-9301653 نمبر سے PO بالانے 10333-9648431 اسم خان محمد سکنہ چمبئی کو کال کر کے بتلایا ہے کہ اپنے بیٹے کانسٹیبل شاہ محمد کو لاک کریں کہ اگر کوئی چھاپہ پولیس لائن سے نکلتا ہے تو مجھے انفارمیشن دیا کریں۔ انوسٹی گیشن سٹاف اس نمبرات کی CDR حاصل کیے جا رہے ہیں وہ بھی اگر موصول ہو جائیں تو ملاحظہ کرنے کے بعد واضح ہو جائے گا۔ میرا بیان حقیقت پر مبنی ہے۔

تحریر: 25.09.2019


SHO / 25/09/2019

Attested



Operative in
Kohat

5/3/2021. DB. Chairman.

Shah Muhammad (Sabir Shah)

Charge sheet 21/9/2019. (Allegation)

FIR No. 478. 20/21/9-2019. Release

Arrest 21/9/2019. Released after 4 days.

Discharge from FIR 9/12/2019

Reply to chargesheet - 25/9/2019

Impugned order also on 28/9/2019.

Dept. Appeal 20/10/2019

Rejected 14/11/2019.

enquiry:

How it was ascertained as to 9 users
in contact with ~~at~~ absconders.

2017 SCMR 356.

DDA/

Impugned order 25/9/2019.

Dept. Appeal 20/10/2019.

Rejected 14/11/2019.

S.A 12/12/2019.

Revision petition.

Rejection 11/8/2020.

concealment of facts:

such rejection order was not challenged

(A)