FORM OF ORDER SHEET

ourt or	 <u> </u>
	•
Case No	583/ 2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge				
1	. 2	3				
1	17/03/2023	The appeal of Mr. Muhammad Ilyas resubmitted today by Mr. Asad Khan Muhammadzai Advocate. It is fixed				
		for preliminary hearing before Single Bench at Peshawai				
		on Parcha Peshi is given to appellant/counsel for the				
		date fixed.				
	·	By the order of Chairman REGISTRAR				
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The appeal of Mr. Muhammad Ilyaz Khan son of Hasham Khan Ex-IHC no. 102 CCP Feshawar received today i.e. on 14.03.2023 is incomplete on the following score which is returned to the co Counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures-B & C of the appeal are illegible which may be replaced by legible/better
- 2- Certificate be furnished that whether any appeal on the subject matter has earlier been filed in this Tribunal.
- 3- Appeal has not been flagged/marked with apprexures marks.
- 4- Annexures of the appeal be attested.
- 5- Memorandum of appeal be got signed by the appellant. $\ensuremath{\smile}$

No. $9.4 \hat{J}_{/S,T}$, Dt. 15/3/2023

REGISTRAR V SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Mr. Asad Khan Mohmmadzai Adv. High Court at Peshawar.

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Asad chan edoolete

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA, PESHAWAR

Service Appeal No <u>583</u>/2023

Muhammad Ilyas Khan

<u>VERSUS</u>

IGP KP and others

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Through:

Appellant

(ASAD KHAN MUHAMMADZAI)

Àdvocate,

High Court Peshawar Cell # 0312-6907475

Dated: -13-03-2023

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA, PESHAWAR

C

Service Appeal No 585/2023

Muhammad Ilyas Khan S/O Hashm Khan Ex-IHC No 102 CCP
Peshawar R/O Pakistan Kalay, Boobak, Tehsil and District
Charsadda.....(Appellant)

VERSUS

- 1. Inspector General of Police, Khyber Pakhtunkhwa Peshawar
- 2. Chief Capital Police Officer, Peshawar
- 3. Senior Superintendent of Police, Peshawar....(Respondents)

Appeal U/S 4 of Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the impugned order dated 16-11-2022 passed by Respondent No 3, whereby the Appellant was removed from service, against which he preferred department representation to the appellate authority, but the same too was rejected vide impugned Appellate order dated 07-02-2023 of Respondent No 2. Similarly, the Appellant was aggrieved from the order of the appellate, authority/Respondent No 2, challenged the order before the Respondent No 1, which is still pending for adjudication

PRAYER IN APPEAL:-

On acceptance of instant Appeal, the impugned order dated 16th November, 2022 passed by the Respondent No 3,

similarly the order dated 07-02-2023 passed by Respondent No 2, may graciously be set aside and the Appellate may be re-instead in service with all back benefits.

Respectfully Sheweth:

Brief facts leading to this service appeal are as under:-

- That the Appellant joint the police force as constable in the year dated 16-10-2001 and performed his duty to the satisfaction of his superior and at time of dismissal, he was posted at Mathra police station, Peshawar.
- That the Appellant is the permanent resident of District Charsadda and belong to very noble and respectable family and performed his duty with full zeal and devotion in police department and during his duty the Appellant was posted different police station of Khyber Pakhtunkhwa.
- That on 10-05-2022, the Appellant was suspended with other two colleagues namely SI Bahar Ahmad No P/153/LPP Mattani, SI Javid Khan No P/138/CPP. The two colleagues were re-instead but the Appellant was removed from service on dated 16-11-2022. (Copy of the suspension order and dismissal order dated 16-11-2022 is attached as Annex 'A and B').
- 4) That during the inquiry, the Appellant was condemned unheard and not opportunity being given, the Appellant has given replied to the show cause notice, in which he properly explained his postion. (Lopy of Reply allemed)

- That when the Appellant received the order of dismissal. Straightaway filed departmental appeal before the Respondent No 2 (Copy of the departmental appeal is attached as Annex 'C'). Immediately the Appellant before the Appellate Authority, but the same was later on dismissed vide order dated 07-02-2023 by the Respondent No 2. The Appellant aggrieved from the order, preferred an appeal to the Respondent No 1, which was still pending and not yet been decided by the Respondent No 1. (Copy of the grounds of appeal is attached as Annex 'D').
- and devotion, during his duty he has also injured severely, but instead of giving reward to the Appellant, order of dismissal was awarded by the department. (Copy of the FIR is attached as Annex 'E').
- 7) That the Appellant being aggrieved from the impugned order dated 07-02-2023, filed an appeal before the competent authority, which appeal has not yet been entertained and the Appellant has been constrained to knock the door of this competent forum for the redressal of his grievances on the following grounds, inter-alia:-

GROUNDS:-

5)

A) That the Respondents have not treated the Appellant in accordance with law, rules and police on the disciplinary action. No notice was issued to the Appellant at home address, thus the proceeding were carried out unilaterally

(4

and the Appellant was deprived of the defence by the Respondents deliberately keeping him unaware of the disciplinary action taken against him.

- B) That the charge sheet and statement of allegation, final show cause notice was not proper, improper allegation has been leveled against the Appellant, which was not proved after conducting improper inquiry. (copes are atched as Annualism F")
- C) That the inquiry was also conducted in a haphazard and fill in the blank manner, as is evident from its report, for imposing major penalty, regular inquiry is necessary, but in the case in hand an irregular, improper inquiry was rushed and conclusion was drawn that the Appellant was guilty of supporting the criminals links with the smuggler, but no criminal smuggler list was given, no record of criminal was provided, since the inquiry was irregular, therefore, the impugned order based upon the same are unlawful and as such not maintainable.
- D) That it is also a settle law that where factual controversy involved in a case then the only alternative is to conduct regular inquiry.
- E) That opportunity of personal hearing was also denied to the Appellant, which is against the principle of natural justice.
- That keeping in view the peculiar fact and circumstances of the case, the imposition of the major penalty is quite excessive, unreasonable and does not commensurate with the guilt of the Appellant. The Appellant was treated with

the harsh manner, despite of that the inquiry was improper. Moreover, on humanitarian grounds too the Appellant deserve leniency, because he is the sole beard earner of his whole family and he has to shoulder the responsibility of his younger brother and sister including his ailing mother.

G) That the Appellant seeks leave of this Honourable Tribunal to reply on additional grounds at the time of arguments.

PRAYER:-

It is, therefore, most respectfully prayed that on acceptance of this Appeal, the impugned order dated 16th November, 2022 passed by the Respondent No 3, similarly the order dated 07-02-2023 passed by Respondent No 2, may graciously be set aside and the Appellate may be re-instead in service with all bank benefits.

Any other relief, which this Honourable Tribunal deems proper in the circumstances of the appeal, may also be granted in favour of Appellant.

Appellant/

Through:

(ASAD KHAN MUHAMMADZAI)

Advocate,

High Court Peshawar

NOTE:-

Dated: -13-03-2023

No such appeal for the same Appellant has earlier been filed by me before this Honourable Tribunal prior to instant one. λ

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA, PESHAWAR

Muhammad Ilyas Khan.....(Appellant)

VERSUS

IGP KP and others.....(Respondents)

<u>AFFIDAVIT</u>

I, Muhammad Ilyas Khan S/O Hashm Khan Ex-IHC No 102 CCP Peshawar R/O Pakistan Kalay, Boobak, Tehsil and District Charsadda, do hereby solemnly affirm and declare on oath that all the contents of accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honourable Court.

> DEPONENT CNIC # 17101-9390533-9 Cell # <u>030|-8934520</u>

Identified by:

(ASAD KHAN MUHAMMADZAI) Advocate .

High Court, Peshawar



BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA, PESHAWAR

Muhammad Ilyas Khan

VERSUS

IGP KP and others

MEMO OF ADDRESSES

APPELLANT

Muhammad Ilyas Khan S/O Hashm Khan Ex-IHC No 102 CCP Peshawar R/O Pakistan Kalay, Boobak, Tehsil and District Charsadda

RESPONDENTS

- 1. Inspector General of Police, Khyber Pakhtunkhwa Peshawar
- 2. Chief Capital Police Officer, Peshawar

3. Senior Superintendent of Police, Peshawar

Through:

(ASAD KHAN MUHAMMADZAI)

Advocate,

Appellant

Dated: -13-03-2023 High Court, Peshawar





OFFICE OF THE SENIOR SUPERINTENDENT OF POLICE OPERATIONS, PESHAWAR

ORDER

The following police officials of CCP Peshawar are hereby placed under suspension and closed to Police Lines Peshawar with immediate.

- i. SI Bahar Ahmed No. P/153 I/C PP Mattani.
- ii. SI Javed Khan No. P/138 I/C PP Sra Khwra
- iii. ASI Ilyas khan No. 102 I/C PP Arbab Tapu

Subsequently, proper charge and summery of allegations will be issued to them separately.

HAROON RASHID KHAN (T.ST PSP)
Sexior Superintendent of Police
(Operations) Peshawar

No. 1497-164/PA, dated Poshawar the 10/05/2022

- 1. The Capital City Police Officer, Peshawar.
- 2. SP/Saddar, CCP, Peshawar.
- 3. SP HQrs, CCP, Peshawar.
- 4. AD IT CCP Peshawar
- 5. EC-II/EC-I
- 6. Official concerned.
- 7. Incharge Emergency Control

/Innea (B)



OFFICE OF THE SR: SUPERINTENDENT OF POLICE, (OPFRATIONS) PESHAWAR Phone, 091-9210508

ORDER

No. 102 while posted as LC PP Arbab Tapu was placed under suspension and proceeded mainst departmentally on the allegations charges that he was found taking undue advantage of his a signed duty. The fact is evident that he is getting bribe from different smugglers of the area and has developed contacts with anti-social and criminal elements and was receiving illegal gratification from them. Being hand in glove with smugglers as well as criminal elements he has brought ball name to Police in particular. That he has a persistent reputation of being cutipit and has maintained a standard of living beyond his known sources of income.

- 2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him, and SP Saddar was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement the allegations partially proved to the extent of contacts. However, the alleged official having mobile Cell Phone No. 0301-8934520 had contacts with Amar Ali (0333-9143946) who is smuegler as per source information and he had made contacts/calls to lum for 19 times.
- On receipt of the findings, Final Show Cause Notice was assued to him vide No. 2827 PA dated 02.11.2022 to which he replied while providing him ample opportunity of self-defence in orderly room on 15.11.2022. He however, failed to advance any plausible explanation in rebuttal of the charges. Thus, the affections against him stand proved. The undersigned being competent authority under (1 the tenex & Disciplinary) Rules. 1975, have decided to impose major penalty of dismissal from service on the accused official. He is, therefore, dismissed from service with immediate effect.

Order announced.

(LI Cdr ® KASHIF AFFAR AHMAD ABBASHPSP Senior Superintendent of Police

(Operations) Peshawar

).

No. 3022-25PA dated Peshawar, the 16/11/12022. Copy for information and pecessary action to:-

1. The Capital City Police Officer, Peshawar.

2. EC-I, EC-II, DASI AS, PO.

3. FMG along with complete enquiry file for record (

OFFICE OF THE SR: SUPERINTENDENT OF POLICE (OPERATIONS) PESHAWAR Phone 091-9210508

ORDER

This office order will dispose-off the departmental proceeding against ASI Muhammad Ilyas No 102 while posted as I/C PP Arbab Tapu was placed under suspension and proceeded against departmentally on the allegations charges that he ws found taking undue advantage of his assigned duty. The fact is evident that he is getting bride from different smugglers of the area and has developed contacts with anti-social and criminal elements and was receiving illegal gratification from them. Being hand in glove with smugglers as well as criminal elements he has brought bad name in Police in general and Arbab Tapu Police in particular. That he has a persistent reputation of being corrupt and has maintained a standard of living beyond his known sources of income.

- 2. Under Police Rule 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Aaddar was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement the allegations partially **proved to the extent of contracts**. However, the alleged official having mobile cell No 0301-8934520 had contacts with Ansar Ali (0333-9143946) who is smuggler as per source information and he had made contracts /cell to him for **19 times**.
- 3. on receipt of the findings. Final Show Cause Notice was issued to him vide No 3822/PA dated 02-11-2022 to which he relied while providing him ample opportunity of self-defence in orderly room on 15-11-2022. He however, failed to advance any plausible explanation in rebuttal of the charges. Thus, the allegations against him stand proved. The undersigned being competent authority under (Efficiency & Disciplinary) Rules, 1975 have decided to impose major penalty of dismissal from service on the accused official. He is, therefore, dismissed from service with immediate effect.

Order announced

(Lt Cdr ® KASHIF AFTAB AHMAD ABBASI) PSP Senior Superintendent of Police (Operations), Peshawar

No 3022-25 PA dated Peshawar, the 16/11/2022 Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar

2. EC-1, EC-II, OASI, AS. PO

3. FMC alongwith complete enquiry file for record (

Homea a C CCPO / 100 1 را) بحصورها - تستال من وليد ع تحسرها دب ليساور VI-1626/pm المعالي و قل الماريل برخلاف 22-11-022 3-22-25/PA - (5/2)! Showing a college light is sept مناب در المناف المالية المناب 空のはいらりからりとうないしますりにあるから الرام مراف الرام المراف الرسال والمراق المراق ا على من دوران وفوق طالبان ورونك د عمل الماهم عملات مالوف وال كرك زمرقادت اكثرن ١١٤ رائمان ها فتون سے مراج @ يري ما المراج فلاف الزاعات ب سيادا ورس الرسي كنوارا ال في المام على المراج المام المراج المر لوگون سے داسطہ اور رواز عربی ہے۔ عرارون آزیں حلفا کران されるとうというできることが、大きのから the Bleverice M. Or Endricher ق يردوران الموافري مارك رسامان الوقع اوردي الحارك ع يرض الله القل ب المال ب المال ب المال بي المراه المراه المراه المال على المراه المراه المال على المراه المراه الم عنوال العمر سراس ما كالشامل ستقل اور مشت برى مرح = c 3 018 93 45 20 = (2) (2) (2) (2) (2) (2) (2) (2) (2) (2) (2) (2) (2) (2) (2) Willed Par July July July

بخدمت جناب چيف کيپڻل پوليس آفيسر صاحب پشاور

مضمون: محکمانہ اپیل برخلاف آرڈر نمبری ، 25/PA - 3022 - 3020 1020 - 11 - 16 جس کی بناء پر سائل کو ملازمت سے برخواست کیا گیاہے

جِنابِ عاليهي . سائل حسب ذيل عرائض رسال -

1۔ بیکہ سائل محکمہ پولیس میں بطور کنسٹبل بھرتی ہوکراچھی کارکردگی اور فرض شناسی کی بناء پر بہ عہدہ IMC ترقیاب ہوکر بے داغ ملازمت انجام دی ہے۔

2_ پیکه دوران ملازمت سائل حسب الحکم آفیسران بالامختلف قتم حساس اور پرخطرتھانہ جات اور چوکیات میں تعینات رہ کر ہوشم کی شریبندوں اور ساج دشمن عناصر کے خلاف پولیس مقابلہ میں بڑھ چڑھ کر حصہ لیا ہے۔

3۔ سیکہ دوران ڈیوٹی طالبان و ملک دشمن عناصر کیخلاف قانونی کاروائی کرکے زیر قیادت افسران بالا ان آہنی ہاتھوں سے نمٹا ہے۔

4۔ پیکسائل کے خلاف الزامات بے بنیاداور من گھڑت ہیں کیونکہ سائل مختلف تھانہ جات میں تعینات رہا ہے جس کی بناء پر ہرشم کے لوگوں سے واسط اور روابط ہوئی ہے علاوہ ازیں حلفاً بیان کرتا ہوں کہ ڈسپلن کے خلاف سی قتم کی کوئی حرکت نہیں کی ہے یہ امر بھی قابل ذکر ہے کہ پولیس اسٹیشن تہکال میں پولیس پارٹ پر بینڈ گرینڈ بلاسٹ میں سائل سخت زخمی ہوچکا تھا جس کا اقتال FIR ہمراہ لف ہے۔

5_ میرکددوران انکوائری سائل کوساعت کاموقع اور نہ ہی جرح کرنے کاموقع دیا گیا ہے۔

6۔ پیکہ سائل بالکل بے گنا ہے اور لگائے گئے الزامات سے لاخبراور لاتعلق ہے۔

7- سيكة عنوان الصدر من السيسائل كاشاندار متقبل اور معيشت يرسى طرح متاثر مواہم

اس لیے درخواست ہے کہ درج بالاحقیقت کی روشنی میں سائل کوملازمت ہر دوبارہ بحال فر ماکرمشکور فر ماکیں

دعا گور ہونگا

0301-89345200

العارض

آب كا تابعد ارتحد الياس CCP Ex 102/IHC





OFFICE OF THE CAPITAL CITY POLICE OFFICER, <u>PESHAWA</u>R

ORDER.

This order will dispose of the departmental appeal preferred by Ex-IIIC Muhammad Ilyas No. 102, who was awarded the major punishment of "Dismissal from service" under KP PR-1975 by SSP Operations Peshawar vide order No. 3022-25 PA. dated 16.11.2022.

- 2- Short facts leading to the instant appeal are that the defaulter HIC while posted as LC PP Arbab Tapu. Police Station Mattani Peshawar was proceeded against departmentally on the following charges:
 - i. He was found taking undue advantage of his assigned duty. The fact was evident that he was getting bribe from different smugglers of the area and developed contacts with anti-social and criminal's elements.
 - Being hands in gloves with smugglers, he brought bad name to police in general and Arbab Tapu Police in particulars.
 - iii. He has a persistent reputation of being corrupt and has maintained a standard of living beyond his known source of income.
- 3- He was issued proper Charge Sheet and Summary of Allegations by SSP/Operations Peshawar. The SP/Saddar Peshawar was appointed as inquiry officer to scrutinize the conduct of the accused official. The inquiry officer after conducting proper inquiry submitted his findings in which the allegations were partially proved to the extent of contacts: The competent authority in light of the findings of the enquiry officer issued him Final Show Cause Notice to which he replied but the same was found unsatisfactory, hence awarded the above major punishment.
- He was heard in person in O.R and the relevant record along with his explanation perused. During personal hearing the appellant failed to submit any plausible explanation in his defence. He was given ample opportunity to prove his innocence but he could not defend himself. Moreover, his previous service record also carries 19 bad entries. Therefore, his appeal for setting aside the punishment awarded to him by SSP-Operations Peshawar is hereby rejected/filed.

(MUHAMMAD (JAZKHAN) PSP CAPITAL CITY POLICE OFFICER, PESHAWAR

No 893-900/PM

dated Peshawar the

B7/CA 1202

Copies for information and necessary action to the:-

- SSP/Operations Peshawar.
- AD/LF CCP Peshawar.
- 3. EC-II, CRC, OASI & Pay Officer
- 4. FMC along with Fouji Missal.

Official Concerned.

بخرون مناب السيلم ونرل آف بولسي بيريدو فواه 893-900/(SNS)/Lilpy Representation - Ugies
colo coportio si Sur - 27-08-2023/019

22/16/20 July 2010 جناب عالى! ماكل درج ذيل عراض رسال هـ. ال يبرك سائل في من أوليس في ورخ 13 200 13 كورطورك و الحرك الحرك الراج ا طارفرد کی اور در ای سالی کے سا دم بر میلاد علان می از اور داع ملازمت سرا خام دی ہے۔ (ف) يم كي دوران مازون سائل عسى الملم آف إن الا في نام رصواس اور بر حطر تقایم جات اور جو لیات میں نشات رہ کر واقع کے ارسی اوں الى سىرى سائل دوليس سنتن تهمال ميں بولين بارق بر هين (كر نير السف 2 is of 10 FIR. 13 lagge (3) cis U. الله المرسم المرسم المرسم المرسم المرسم على حور الرجود وراس هي المراج المرب ا ما الوسائع المان ونين عور فورهم و 16 م المر 16 مام بالا مان والمان ونين الور داراب الوصل وسن سورانا ج والواج والواج والما حيد نا والما المراق الما المراق ا يوساً سي سالقه م و م بير جناب ملك صبي عامل الحرس التي الم جورور روز فتلف مسم كرالزام رئي تق اجره تورخ 17 كر توالم ور 3920 mg 16 20 ll 11 1 2 16 de 05 p de le 05 p de le 16 pie جانے لو تھا نرفتنی میں لعرض ڈبورٹی لعمات کیا گیا، قشک قورخ ہلاہ آ 19 کو الد مريخر 8 محكم علام ما موسى الا بحركي مره ما وروفا في مين عبري ما عرف في الم اور لجرس قار كى قتلى جركات س دود قرس الحام دى هـ اورا مركار مورخ موجه موجود في معمل بوليث لباليا . CDR ربورث من مس البرس رالط الواقع. لعفى اوقات الروليين المسركولسي الم معلومات ما مفاري فأطر مرورت عوق هے ليكن إس كو جرديانتي سے فلط رئي ماليا جے۔ خلقاً بیان کرنا ہوں کہ کسی سم کے کرچشی یا دڑیا در یا ملوث ہونے خاط من کسی سے دارط کیا ہے۔ اور نہ کرینگ من سائل نے جرف اور جرف ابنی ڈہوتی المایت ایمانزاری سے سرا داع می رو

ع من سائل ف از باب نايو ميل إو سط مين ونال الله بهينه (ادى هے. صریس دهش گردون کی تریشس لعی دهمکی کی وجه سے مزیمائل كيسالة أرق الفسى كالمسران ولفرى لعينات تق التن كم مرص اوردوس کے فورسنر اور صیاس ا داروں کی فوجورگی میں فن سائل کسیر سمقارون اور کیمناز دوگون سے مل سکتے جے. @ يم كم سأل براورن سے دیارہ اٹاتے کا انزام ہے ۔ سائل ایک دیماتی با شرہ عِيد اور نسيرار كوراني سے لقات ركھتا جے . اور گھركے لغير كيك سندل بنیک امت باکستان سے مصم موں اربور (چوره اور محم موه روب (دولاله) اور فول سلا كو لاهم المور فول سلا كو لاهم الله على ای بیرد روزان انگوافری سائل کو دی ساعت ما دو قع اور نهی مرح کرنے عَاقِ قَعِ دِيالَّيَا جِهِ اورالُرسالُ لَو وَقَعِ دِيالَيَا . وَإِلَى بِإِنْ اوْرالُ رفي المالي المال المراس الله المراس الله المالية المراس الله المراس الله المراس الله المراس الله المراس الله المراس الله المراور لا لقلق جع . إسك درواس هيك درج بالاحقيق كي روشي مي سائل كو مالارف ير دوباره باك فرما كرستكورو همون فرماش سائل ناصات دعا تورسا العارمز relative CCP EX 102 CVILLES TO COT EX 100 03018934520 كالم

بر 2286/13 قادم شور قيدادائك براروجر زمود 2010.06.2011 فيدور قادم شورجان عور مرحد فارتمرا فارم نمكر الأره (١) ابتذا في اطلا في ربورك ابتدائي اظلاح نلب جرم قابل دست اعدادي وليس البرزف شده زيره فعيه ١٥ محوته ضابط فوجداري مع المراقع الم والحرّ مالة ١١٠٥ مالم يتعال PPC 324-353-427 3 Exp Sub Act طالكوافئ تبعال نددجي المان كلم الشم كى جَيْفَيْش كِمْ مَعْلَق كَ مَن أكر اللاع درج كرف من توقف موا موتو وجه بيان كرو پيرزوا^{تق} با کي تاريخ دونت ابتدان اطلاع سيحورج لرو بعف مسد حماتيه تحديدى ساسلم سعاد بالمال حسال الملك عمالية وقوعم لم ترفيع المان آليام الله يد هند الدسيد مسكاكيا ي مفری طفیا بد بندی نولیس کے ہما 8 بسواری سرفاری سواری موجع A 7 سرفع موجود عفاسة اس دولاك آيان هينا السلط عيستا الذا حس بلي التحواب بدليس موياليا 8088 نقطان دسدہ بنور نو لیس نو ایکان نے زری ساماری ڈیوٹی بد موجود آبستان اطہار کی فق الیا بین فرق اوسٹ کے سطانے کی وں سے بات کے دیکا ہوتے۔ آبستان اطہار کی فق الیا بین فرق اوسٹ کے سطانے کی وہ سے بات کے دیکا ہوتے۔ من على حلية معالى المستاف معياك المد الجار ح KTH كو نفسه صرب إكر سال عال نے دستی کی تیا بیٹ آئیا مائٹہ ہے جمع بید ہسٹا کے سائد مسئلی خلاقیا نیڈ جسم سے نیڈ لیس مُقَّنَائِیل بقوان نے سیع اور ملازمان نیٹی ہوئے سائ مِعْلَمِينَا لَيْ الْمُعْلَى عَلَيْهِ الْمُعْلِقِينَ اللَّهِ اللَّهِ اللَّهِ مِنْ اللَّهِ اللَّهِ اللَّهِ اللّ هُ وَ الْمُسْتِلُ لَا يُورِبُ أَنْ نَيْنَاكُ مِمَا الْمُرْجِيَّ وَهُ لِيَّا الْمِيلِّ لَكُورِ الْمُنْ الْمُنْ ال الشيخ في معلق في الله في الله في المان المان الدريا بون و المان ال وَعَانَهُمْ الْمُ مِنْ مُنْ الْمُورِدُ وَمُعَالُو فِي مِعَانَ أَمْدِهُ عَدْيِدِي وَاسْلَمْ وَرَفَ حَدْدِ مِرْنَ م فالله على للناجات العسان بال لعبطور سيسل ريور في اطلاع بيطة والتستين لاردان المالاس

51 PS TEHKAL 25-11-15

ونا يالي ر

البرليس اليرا و سرل عالى المراك المر

Annea F

1. In the son Rashid Khan PSP, SSP/Operations Pesnawar as competent authority, am of the opinion that ASI Hyas Khan No. 102 I/C PP Arbab Tapu District Peshawar has rendered himself liable to be proceeded against departmentally as he has committed the following acts/omission within the meaning of section 03 of the Khyber Pakhtunkhwa Police Rules, 1975.

- i) It has been observed that he was found taking undue advantage of his assigned duty. The fact is evident that he is getting bribe from different smugglers of the area and have developed contacts with anti-social and criminal elements and was receiving illegal gratification from them.
- Being hand in glove with smugglers as well as criminal elements you have brought bad name to Police in general and Arbab Tapu Police in particular.
- That he has a persistent reputation of being corrupt and have maintained a standard of living beyond his known sources of income.
- iv) All this comes within the purview of 'corruption' under Police (E&D) Rules, 1975.
- 2. For the purpose of scrutinizing the conduct of afore said police official in the said episode with reference to the above allegations SP Sadda. is appointed as Enquiry Officer under Rule 5 (4) of Police Rules 1975.

3. The Enquiry Officer shall in-accordance with the provision of the Police Rules (1975), provide reasonable opportunity of hearing to the accused Official and make recommendations as to punish or other action to be taken against the accused official.

HAROON RASHID KHAN (T.ST PSP)
Semior Superintendent of Police

Operations) Peshawar

No. <u>63</u> E/PA, dated Peshawar the

Copy to:-

1. The Inquiry Officer.

2. The Delinquent official through PA to the EO officer

