

02nd May, 2023

1. Learned counsel for the appellant present: Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.
2. Learned counsel for the appellant seeks adjournment on the ground that he has not made preparation for arguments. Last opportunity is granted. To come up for arguments on 06.06.2023 before the D.B. Parcha Peshi is given to the parties.



(Salah-ud-Din)
Member (J)



(Kalim Arshad Khan)
Chairman


SCANNED
KPST
Peshawar

06th Dec, 2022

Learned counsel for the appellant present. Mr. Muhammad Jan,
District Attorney for the respondents present.

Learned counsel for the appellant produced certified copy of the judgment in Service Appeal No. 1387/2020 handed down by Mr. Salah-ud-Din learned Member (Judicial) and submitted that regarding the same episode the judgment of the Tribunal was passed reinstating one Zaheen Shah, therefore, it is appropriate that this appeal be also heard by a bench in which Mr. Salah-ud-Din Learned Member (Judicial) is a member. To come up for arguments on 03.02.2023 before the bench in which Mr. Salah-ud-Din learned Member (Judicial) is a member.

SCANNED
KPSBT
Peshawar


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

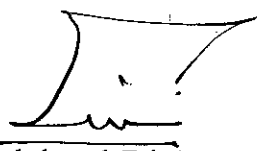
03.02.2023

Clerk of learned counsel for the appellant present.
Mr. Arif Saleem, Steno alongwith Mr. Muhammad Jan, District Attorney for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 02.05.2023 before the D.B.

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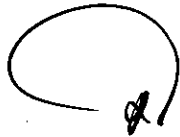

(Fareeha Paul)
Member (E)


(Salah-ud-Din)
Member (J)

23.08.2022

Clerk of learned counsel for the appellant present. Mr. Arif Saleem, Steno alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is out of station today. Adjourned. To come up for arguments on 01.11.2022 before the D.B.



(Rozina Rehman)
Member (Judicial)

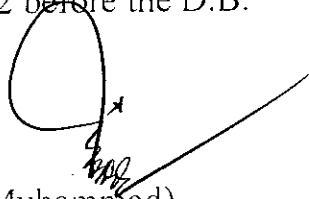


(Salah-Ud-Din)
Member (Judicial)

01.11.2022

Appellant alongwith his counsel present. Mr. Arif Saleem, Steno alongwith Mr. Muhammad Jan, District Attorney for the respondents present.

Learned counsel for the appellant requested for further time for preparation of arguments. Adjourned. To come up for arguments on 06.12.2022 before the D.B.



(Mian Muhammad)
Member (E)

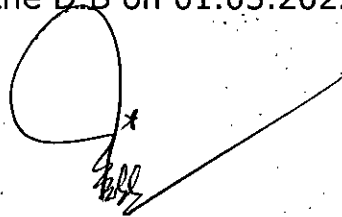


(Salah-Ud-Din)
Member (J)

19.11.2021

Clerk of learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is ill today. Adjourned. To come up for arguments before the D.B on 01.03.2022.



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)

01.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 06.06.2022 for the same as before.



Reader.

6th June. 2022

Proper D.B is not available. Therefore, case is adjourned to 23.08.2022 for the same as before.



Reader

05.04.2021

Appellant in person present. Mr. Kabirullah Khattak learned Additional Advocate General alongwith Arif Saleem Stenographer for respondents present.

Reply/comments on behalf of respondents not submitted. Representative of respondent requested for time to submit reply/comments. Granted. To come up for reply/comments on 17.07.2021 before S.B.



(Atiq Ur Rehman Wazir)
Member (E)

12.07.2021

Appellant in person and Mr. Kabirullah Khattak, Addl. AG alongwith Arif Saleem Steno for the respondents present.

Written reply/Comments have been submitted. The appeal is entrusted to D.B for arguments on 19.11.2021.




Chairman

29.10.2020

Appellant present in person.

Lawyers are on general strike, therefore, case is adjourned to 13.01.2021 for preliminary hearing, before S.B.


(Rozina Rehman)
Member (J)

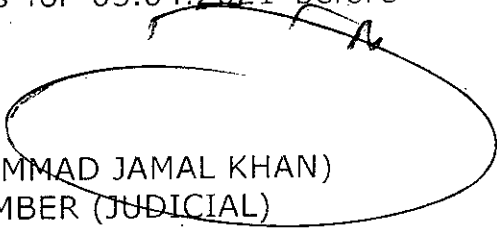
13.01.2021

Syed Mudassir Pirzada, Advocate, for appellant is present.

The initiation of disciplinary proceedings against the appellant was stated due to not conveying information to the Police higher-ups regarding holding of a music concert in the precincts of police post situated at Summari Bala. According to the learned counsel the awarding of the penalty in question did not precede conformity and observance to the rules on the subject. On exhausting departmental remedy the present service appeal was filed.

The point so agitated at the bar needs consideration. The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 05.04.2021 before S.B.

Appellant Deposited
Security & Process Fee




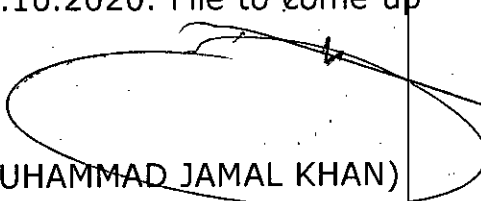

(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 3190 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/04/2020	<p>The appeal of Naimat Khan submitted today by Mr. Syed Mudasir Pirzada, Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please</p> <p> REGISTRAR 21/4/2020.</p>
2-	29.05.2020	<p>This case is entrusted to S. Bench for preliminary hearing to be put up on <u>29-05-2020</u></p> <p> MEMBER</p> <p>Nemo for appellant.</p> <p>Notices shall be issued to appellant/counsel for preliminary hearing on 06.08.2020 before S.B.</p> <p> Chairman</p>
06.08.2020		<p>Syed Mudasir Pirzada, learned counsel for the appellant is present. He is seeking adjournment for non-preparation of the instant appeal. Adjourned to 29.10.2020. File to come up for preliminary hearing before S.B.</p> <p> (MUHAMMAD JAMAL KHAN) MEMBER</p>

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal 29/90 2020

Naimat Khan Ex-(Police Constable No-499 of Operation Staff) Kohat.

(Appellant)

VERSUS

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

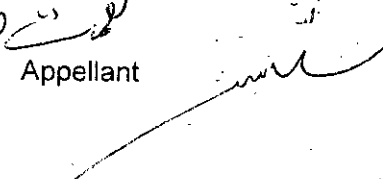
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5	Copy of departmental representation dated 26-12-2019 and Rejection order dated:-27-02-2020	B	16-19
	Wakalatnama		20


Appellant

Through

Date 26/03/2020


Syed Mudasir Pirzada
Advocate, High Court
Peshawar
Cell# 0345-9645854

①

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Appeal No 3/90/2020
Naimat Khan Ex-(Police Constable No-499 of Operation Staff) Kohat.

(Appellant)

VERSUS

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

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 29-11-2020- VIDE OB-NO 1609 IN WHICH THE RESPONDENT NO:-3 DIRECTLY AWARD THE MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE WITH IMMEDIATE EFFECT AND THE APPELLANT PREFERRED DEPARTMENTAL REPRESENTATION DATED 26-12-2019 BUT THE SAME WAS REJECTED ON 27-02-2020

Respectfully Sheweth,

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

Facts:

Briefly facts as per impugned order are that the appellant was posted at Summari Bala post and on 06-09-2019 a musical program had arrange to notorious proclaimed offender anwar hayat group at police post summary Bala .(Copy of impugned order along with charge sheet & FCN along with reply is annexed as annexure A)

That a video program was viral in which illegal activities are shown but the appellant did not informed his seniors regarding the illegal program and hide the facts .which shows the inefficiency and gross misconduct on the part of appellant.

That on the basis of above allegation charge sheet and statement of allegations, along with final show cause notice was served and the appellant had duly submitted the reply of the same which was not consider nor enquire the actual crux and blessed with the impugned punishment .

That without considering the defense of the appellant ,the competent authority awarded major punishment of dismissal from service to the appellant vide impugned order mentioned above.

That again an unjust has been done with the appellant by not giving ample opportunity of personal hearing as well as appellant submitted written request that appellant may kindly be heard in person but in vain even the alleged allegations were not properly enquired by so called enquiry officer Just on the basis of enquiry finding report of the enquiry officer appellant held guilty by enquiry officer without following the prescribed rules relating to enquiry proceedings as per Police Rules 1975 (amended 2014).

1. That the all the proceedings conducted against the appellant are against the police rules on the basis that the appellant had personally informed the Choki Incharge regarding the illegal program but in vain but this fact was not consider by respondent No-3 and blessed with impugned punishment order.
2. That there is nothing is on the record which connect the appellant with the allegation nor proved and the appellant is blessed with impugned punishment which not warranted by law.
3. That nothing has been proved beyond any shadow of doubt that the appellant has committed any misconduct and shows inefficiency in discharge of his lawful duty .
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 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 nor record the statement of Incharge of Police Post and ex-partly proceedings conducted against the appellant without probing held guilty the appellant without following the prescribed rules relating to enquiry proceedings as per Police Rules 1975 (amended 2014).
6. That the when appellant was neither provided an opportunity to cross examine the or to produce defense evidence then enquiry proceedings were accordingly defective. Furthermore the requirements of service rules have not been observed while awarding the impugned punishment.
7. That nothing has been proved beyond any shadow of doubt that the appellant has committed any misconduct or tarnished the image of Police department.
8. That there are numerous good entries in the service record having 28 years of service which almost served with respondent No-2 Officer at Kohat which could be verified form quarter concerns but this fact has not been taken in

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consideration while awarding the impugned major punishment which is against to the canon of justice.

9. That the allegation mentioned in impugned order and other departmental proceedings are in contradiction with each other.
10. That the appellant feeling aggrieved from the impugned order the appellant prefer departmental representation which was not considered and the same was rejected on dated 27-02-2020 issued on 03-03-2020 (Copy of representation and rejection order annexed as annexure B)
11. That the appellant dragged unnecessarily into litigation which is clearly mentioned in 2008 SCMR 725.
12. 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.
13. That the respondent department often never kept in mind the appellant's good service record at the time of dismissal and, the respondent department legal branch always misguide the seniors regarding issuance of any impugned order even if asked that as to why this conduct is adopted by legal branch then the concerns always spread misconceptions against the appellant as well as against the legal fraternity for no good reason hence the appellant is badly suffers
14. That the appellant feeling aggrieved from the impugned order having no alternate remedy except this honourable tribunal on the following grounds inter alia.

Grounds:

- a. That no enquiry has been conducted none from the general public was examined in support of the charges leveled against the appellant. No allegation mentioned above are practiced by the appellant nor proved against any cogent reason against the appellant.
- b. That the appellant was neither intimated nor informed by any source of medium regarding enquiry proceedings for any disciplinary action which shows bias on the part of respondent No-3 as well as the legal branch Kohat.
- c. That the appellant had properly informed the senior as due to the Mohrram all the cell networks were off and no source of electricity was available to immediately inform the seniors as receive information regarding program as well as the appellant is constable and the program

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was arranged by other senior officials as well as the Moharrar of the choki and the appellant had properly informed the DSB in charge after the convenience of above mentioned services which could be verify from the DSB In charge but in vain.

- d. That the role of the appellant had not shown in video nor the appellant was deputed on the occasion as the appellant was on roof top duty as per order.
- e. That the appellant was not heard in person nor called in orderly room and falsely mentioned in the impugned order that the appellant was called because the when the expertly proceedings were conducted then how could it possible that the appellant was heard and called for orderly room which does not appeal to a prudent mind .
- f. That it is not ascertainable that what element had promoted the competent authority to award the major punishment to the appellant in hasty manner.
- g. That as per the constitution of Islamic Republic Of Pakistan clearly speaks about the fundamental rights that the fair and transparent enquiry is the right of any employee.
- h. That the punishment is harsh in nature and the appellant is vexed for undone single offence which is against the constitution of Islamic republic of Pakistan 1973.
- i. That no statement of any person nor any official has been recorded which connect the appellant with the guilt .
- j. That the appellant is honest and dedicated one and leave no stone unturned to discharge his duties.
- k. That as per universal declaration of human rights 1948 prohibits the arbitral / discretion.
- l. That the respondent No-3 had not issued the show cause notice to the appellant and the respondent above has acted whimsically and arbitrary, which is apparent from the impugned order.
- m. 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.
- n. That the departmental enquiry was not conducted according to the rules.
- o. That the impugned order is outcome of surmises and conjecture.

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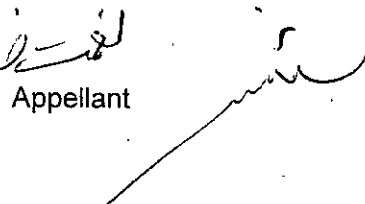
Pray:

In the view of above circumstances it is humbly prayed that the impugned order of Respondent No-3 dated 29-11-2019 vide O.B. No-1609 Kohat may please be set aside for the end of justice and the appellant may please be graciously re-instate in service with all back benefits.


Appellant

Through

Date 26/03/2020


Syed Mudasir Pirzada
Advocate, High Court
Peshawar
Cell# 0345-9645854

(6)

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal _____ 2020

Naimat Khan Ex-(Police Constable No-499 of Operation Staff) Kohat.

-----Appellant

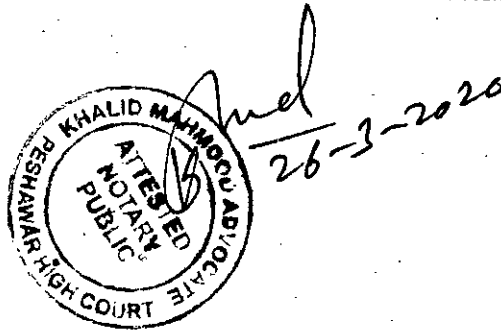
VS

INSPECTOR GENERAL OF KPK POLICE PESHAWAR & Others

-----Respondents

AFFIDAVIT

I, Naimat Khan Ex-(Police Constable No-499 of Operation Staff) Kohat., 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.



نایم خان
DEPONENT

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BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Naimat Khan Ex-(Police Constable No-499 of Operation Staff) Kohat.

(Appellant)

VERSUS

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

ADDRESS OF THE PARTIES

APPELLANT :-

Naimat Khan Ex-(Police Constable No-499 of Operation Staff) Kohat.

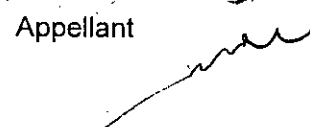
RESPONDENTS

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


Appellant

Through

Date 26/03/2020.


Syed Mudasir Pirzada
Advocate, High Court.
Peshawar
Cell# 0345-9645854



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

Annexure A
P-8

ORDER

This order will dispose of departmental enquiry conducted against Constable Nemat Ullah No. 449 of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

Facts arising of the case are that on 06.09.2019 a musical program had arranged to notorious proclaimed offender Anwar Hayat group at Police Post Sumari Bala.

ii. A video of the program was viral in which illegal activities are shown, but he did not informed his seniors regarding the illegal program and hide the facts, which shows his inefficiency and gross misconduct on his part.

For the above, serious / professional misconduct of the accused official, charge sheet alongwith statement of allegations was served upon the accused official. SDPO Lachi, Kohat was appointed as enquiry officer to scrutinize the conduct of accused official. The Enquiry officer vide his report established the charge leveled against the defaulter official and recorded statements of the other relevant officials, which they have mentioned about music program inside PP Sumari has committed immoral, illegal and un-Islamic act of arranging music program intentionally inside PP Sumari in Muharram Ul Haram in collaboration with POs with whom he has relations.

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 26.11.2019 and afforded opportunity of defense but he failed to submit any plausible explanation. This speaks of professional misconduct and shows inefficiency in discharge of his lawful duty.

From the above, I have reached to the conclusion that the accused official being member of a disciplined force had developed relations with notorious PO gang and facilitated the gang, 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.


ATTESTED

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 Nemat Ullah No. 449 with immediate effect. Kit etc issued be collected.

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DISTRICT POLICE OFFICER,
KOHAT 29/11/19

OB No. 1603
Dated 29-11-19

No. SICEL-65 IPA dated Kohat the 29-11-2019.

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./L.O for clearance report

DISTRICT POLICE OFFICER,
KOHAT 29/11/19

~~ATTESTED~~



Office of the
District Police Officer,
Kohat

No. 29894-95/PA

2125/L
11-10-2019

Dated: 08-10-2019

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CHARGE SHEET.

1. **CAPT (M) WAHID MEHMOOD, DISTRICT POLICE OFFICER, KOHAT,** as competent authority under Khyber Pakhtunkhwa Police Rules (amendments 2014) 1975, am of the opinion that you **Constable Naimat Ullah No. 449** 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. On 06.09.2019 a musical program had arranged to notorious proclaimed offender Anwar Hayat group at Police Post Sumari Bala.
- ii. A video of the program was viral in which illegal activities are shown, but you did not informed your seniors regarding the illegal program and hide the facts, which shows your inefficiency and 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 07 days of the receipt of this Charge Sheet to the enquiry officer.

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

4. A statement of allegation is enclosed.

[Handwritten signature]

Shah Dams
11-10-2019

**DISTRICT POLICE OFFICER,
KOHAT**

ATTESTED



Office of the
District Police Officer,
Kohat

No. 29094-95/PA

Dated 08-10 /2019

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DISCIPLINARY ACTION

I, **CAPT @ WAHID MEHMOOD, DISTRICT POLICE OFFICER, KOHAT** as competent authority, am of the opinion that you **Constable Naimat Ullah No. 449** have rendered yourself liable to be proceeded against departmentally under Khyber Pakhtunkhwa Police Rule 1975 (Amendment 2014) as you have committed the following acts/omissions.

STATEMENT OF ALLEGATIONS

- i. On 06.09.2019 a musical program had arranged to notorious proclaimed offender Anwar Hayat group at Police Post Sumari Bala.
- ii. A video of the program was viral in which illegal activities are shown, but you did not informed your seniors regarding the illegal program and hide the facts, which shows your inefficiency and gross misconduct on your part.

2. For the purpose of scrutinizing the conduct of said accused with reference to the above allegations DSP Laili Khasht 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. 29094-95/PA, dated 08-10 /2019.

Copy of above to:-

1. DSP Laili Khasht :- 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.

ATTESTED

جواب طارق سید الباری لوٹن جوہلا

120

صاف عالی

محلہ طارق سید سب سے بی PA/95-29094 جمع

8 جمادی الاول 1419ھ کو لوٹن کے لئے صاف عالی لوٹن کے لئے جمع کر کے الیوم
میں لوٹن کے لئے جمع کر کے الیوم میں جمع کر کے الیوم اور جمع کر کے الیوم

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ATTESTED

(Handwritten mark)

(12-A)

وہاں لکھی گئی تھیں۔ تو میں سمجھا کہ یہ لکھی
گئی ہیں۔ اور وہ لکھی گئی ہیں۔ تو مجھے درلود میں سمجھتے
سے تھے۔ ابراہیم نامہ لکھی گئی تھیں۔ تو میں سمجھا
کہ انہاں والی سماں انہاں طرف لکھی گئی ہیں۔

جو کہ سماں میں اس وقت سے شروع ہوا ہے
جو ہوتا ہے۔ اس میں لکھی گئی ہیں۔ اور اس میں
سماں لکھی گئی ہیں۔ اس میں لکھی گئی ہیں۔
جو کہ شروع ہوا ہے۔

جو کہ میں میں سے لکھی گئی ہیں۔ اور اس میں
اور حال میں لکھی گئی ہیں۔ جو کہ میں میں لکھی گئی ہیں۔
جو کہ میں میں لکھی گئی ہیں۔

جو کہ میں میں لکھی گئی ہیں۔ اور اس میں
جو کہ میں میں لکھی گئی ہیں۔ اور اس میں
جو کہ میں میں لکھی گئی ہیں۔ اور اس میں
جو کہ میں میں لکھی گئی ہیں۔ اور اس میں

ATTESTED



سے لکھا جا سکتا ہے

میں سائل اٹھائے کر اپنے رہنمائی اور قصور
کی بات نہیں ہر حال طور پر جس میں اس کا

استدعا ہے سائل خاتون باللہ کے ساتھ الرحم
میں ایک تیز ترین صورت میں سے حساب فرما جائے رہے تاکہ
اور 2 قصور ہو

جامعہ سے داخل دفتر و ملا جائے

66
19

لکھنا
449
کے ساتھ
کے ساتھ

ATTESTED



OFFICE OF THE
DISTRICT POLICE OFFICER,
KOHAT

Tel: 0922-9260116 Fax 9260125

No 44066/PA dated Kohat the 13/11/2019

FINAL SHOW CAUSE NOTICE

I, Capt. M Wahid Mehmood, District Police Officer, Kohat as competent authority, under the Khyber Pakhtunkhwa Police Rules 1975, (amended 2014) is hereby serve you, Constable Naimat Ullah No. 449 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. 29044-45/PA dated 06.10.2019.

ii. On going, through the finding and recommendations of the inquiry officer, the material on record and other connected papers including your defense before the inquiry officer.

I am satisfied that you have committed the following acts/omissions, specified in section 3 of the said ordinance.

a. *On 06.09.2019 a musical program had arranged to notorious proclaimed offender Anwar Hayat group at Police Post Sumari Bala.*

b. *A video of the program was viral in which illegal activities are shown, but you did not informed your seniors regarding the illegal program and hide the facts, which shows your inefficiency and 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

13/11

ATTESTED

جواب شوکار ٹوٹس چارج منجانب ڈائریکٹ پولیس آفیسر صاحب کو دیا گیا
مورخہ 11/7/11 نمبر 66664 کی جانب سے عرض میں

یہ کہ جو الزامات فائنل شوکار ٹوٹس سے من سائل کے خلاف عائد ہوئے ہیں
بالکل غلط اور بے بنیاد ہیں

یہ کہ پہلے تو رجسٹر نمبر 2 روز نامہ کے گریبان بلا زمان میں سوئم ڈیولپ ہو کر
2 بجے رات سے صبح تا تک کھلے اور اس کے واقعے کی میوزک پروگرام سے بالکل
لا علم تھا کیونکہ میری ڈیوٹی اس وقت نہیں تھی

یہ کہ جہاں تک میوزک پروگرام کی ذمہ داری کا تعلق ہے نہ تو من سائل
کامیٹیل آفس ویڈیو میں موجود ہے اور یہی واقعہ کا علم تھا۔

یہ کہ من سائل نے اپنے تمام تر سروک ڈیوٹی جی آفس میں سرانجام دی ہے
اور Good Service دیکھا ہے

یہ کہ جناب افسران بالا جوڈ سے میرا تمام ڈیوٹی ریکارڈ طلب فرما سکتے ہیں
جو میری بے گناہی کا ثبوت پیش کرتی ہیں

یہ کہ جوڈ سے قبل بھی من سائل نے جواب پیش کیا ہے جس میں من سائل
نے بیان کیا ہے کہ من سائل نے بعد از وقوعہ تمام میوزک اور ذہانی طور پر

جوئی اپنا راز کو بتایا اور دیگر جوڈات جوئی میوزک کی ایسا کہ پیش
کیے کیونکہ سائل پر لانی میرا راز کیا گیا تھا

یہ کہ من سائل تمام تر مطالب میں بے قصور اور بے گناہ ہیں اور مرتکب
ایسا کارروائی وہ سے ناہت ملوث کیا گیا ہے اور دیگر حقائق بوقت

Personal Hearing کی اجازت ملنے پر پیش کریں گے
لیکن استہدایہ کہ من سائل کے خلاف فائنل شوکار ٹوٹس کے

احکامات صادر فرمائیں
لغات خان ایف ایم خود

ATTACHED

BEFORE THE DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT

P-16

SUBJECT: APPEAL AGAINST THE IMPUGNED ORDER DATED 29-11-2019 VIDE O.B NO-1665 UPON THE FINDINGS OF ENQUIRY OFFICER THE APPELLANT KHAN SALEEM CONSTABLE No-97 WAS AWARDED MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE WITH IMMEDIATE EFFECT.

Respectfully Sheweth,

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

Facts:

Briefly facts are that the appellant was posted at Summari Bala post and on 06-09-2019 a musical program had arrange to notorious proclaimed offender anwar hayat group at police post summary Bala .(Copy of impugned order along with charge sheet and other departmental proceedings along with reply is annexed)

That a video program was viral in which illegal activities are shown but the appellant did not informed his seniors regarding the illegal program and hide the facts .which shows the inefficiency and gross misconduct on the part of appellant.

That on the basis above allegation charge sheet and final show cause notice only was served and the appellant had duly submitted the reply of the same which was not consider nor enquire the actual crux and blessed with the impugned punishment .

That without considering the defense of the appellant ,the competent authority awarded major punishment of dismissal from service to the appellant vide impugned order mentioned above.

That again an unjust has been done with the appellant by not giving ample opportunity of heard in person nor properly enquired the allegation. Just on the basis of enquiry finding report of the enquiry officer recommend the appellant as guilty by enquiry officer without following the prescribed rules relating to enquiry proceedings as per Police Rules 1975 (amended 2014).

1. That the all the proceedings conducted against the appellant are against the police rules on the basis that the appellant had was not on duty at the time of musical program which could be verify from PP record but in vain and this fact was not consider by DPO Kohat and blessed with Impugned punishment order.
2. That the appellant had served all his service in worthy DIG office Kohat and first time performing the duty at said Chowki.
3. That there is nothing on record which connects the appellant with the allegation.

ATTESTED

4. That nothing has been proved beyond any shadow of doubt that the appellant has committed any misconduct and shows inefficiency in discharge of his lawful duty .
5. 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.
6. That the appellant was neither provided an opportunity to cross examine the witnesses nor to produce defense evidence and the enquiry proceedings accordingly defective as well as when the appellant was not on duty Furthermore the requirements of service rules have not been observed while awarding the impugned punishment.

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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 properly enquired by any enquiry officer.
- 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 appellant had properly informed the senior as due to the Mohrram all the cell networks were off and no source of electricity was available to immediately informed the seniors as well as the appellant is constable and the program was arranged by other officials as well as the Moharrar of the choki and the appellant had properly informed the DSB in charge after the convenience of above mentioned services which could be verify from the DSB in charge as well.
- d. That the role of the appellant had not shown in video nor the appellant was deputed on the occasion as the appellant was on roof top duty as per order.
- e. That no statement of any person nor any official has been recorded which connect the appellant with the guilt .
- f. That the appellant is honest and dedicated one and leave no stone unturned to discharge his duties.
- g. That as per universal declaration of human rights 1948 prohibits the arbitral / discretion.
- h. That the DPO Kohat has acted whimsically and arbitrary, which is apparent from the impugned order.
- i. 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.

ATTESTED

That the departmental enquiry was not conducted according to the rules.

k. That the impugned order is outcome of surmises and conjecture.

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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 appellatant may please be graciously be reinstated in service with all back benefits.

Date: 26/12/2019

نیمت اللہ

(Appellant)

Naimat ullah
(Ex-Police Constable)
No.449 Kohat.

~~ATTESTED~~

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POLICE DEPTT:

KOHAT REGION

ORDER.

This order will dispose of a departmental appeal, moved by Constable Naimat Khan No. 499 of Operation Staff Kohat against the punishment order, passed by DPO Kohat vide OB No. 1609, dated 29.11.2019 whereby he was awarded major punishment of dismissal from service on the following allegations:-

- i. The appellant while posted at Police Post Sumari Bala arranged a musical program to notorious PO Anwar Hayat group at PP.
- ii. A video of the program was viral in which his presence / illegal activities are shown.
- iii. His illegal act caused embarrassment, damaged the image of Police and proved links / relations with a notorious PO group wanted in numerous heinous crimes including target killing of 04 Police officers.

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 27.02.2020. During hearing, he did not advance any plausible explanation in his defense to prove his innocence and just 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. Therefore, his appeal being devoid of merits is hereby rejected.

Order Announced
27.02.2020



[Signature]
(TAYYAB HAFEEZ) PSP
Region Police Officer,
Kohat Region.

No. 3249 /EC, dated Kohat the 3-3-2020.

Copy to District Police Officer, Kohat for information w/r to his office Letter No. 401/LB, dated 08.01.2019. His Service Roll & Fauji Missal / Enquiry File is returned herewith.

OHG/SAC
for 21/2/2020




ATTESTED

[Signature]
District Police Officer,
Kohat *3/3/2020*

[Signature]
(TAYYAB HAFEEZ) PSP
Region Police Officer,
Kohat Region.

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44265 ایڈوکیٹ:	پشاور بار ایسوسی ایشن، خیبر پختونخواہ	
بار کونسل ایسوسی ایشن نمبر:	بعدالت جناب: RPK سر سید محمد علی کھٹک	
رابطہ نمبر: 0345-9645854		

منجانب: <i>Appellant</i>	دعویٰ: <i>مستحق</i>
علت نمبر:	مورخہ:
جرم:	تھانہ:
مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ	
ہجرت خان بنام <i>محمد علی کھٹک</i>	
بابت تحریر آگے	

آن مقام *کھٹک* کیلئے *محمد علی کھٹک* کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با 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 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: 26/3/2020

العبد العبد
 محمد علی کھٹک

مقام کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 3190/2020
Nimat Khan ex-const: No. 499

..... Appellant

VERSUS

Inspector General of Police,
Khyber Pakhtunkhwa & others

..... Respondents

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3.	Copy of FIR regarding target killing of Police officers	A	06
4.	Copy of reply to final show cause notice	B-B1	

Deponent

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 3190/2020
Nimat Khan ex-const: No. 499

..... Appellant

VERSUS

Inspector General of Police,
Khyber Pakhtunkhwa & others

..... Respondents

PARAWISE COMMENTS BY RESPONDENTS.

Respectively Sheweth:-

Parawise comments are submitted as under:-

Preliminary Objections:-

- i. That the appellant has got no cause of action.
- ii. The appellant has got no locus standi.
- iii. That the appeal is bad for misjoinder and nonjoinder of necessary parties.
- iv. That the appeal is bad in eyes of law.
- v. That the appellant is estopped to file the instant appeal for his own act.
- vi. That the appeal liable to be dismissed in limine as, the appellant himself admitted the misconduct in his memorandum of appeal.

Fact:-

The appellant had links with notorious proclaimed offender groups named Anwar Hayat group, wanted in numerous criminal cases including target killing of 04 Police officers. The appellant while posted at Sumari Bala Police Post, located at vicinity of PO Anwar Hayat village, had arranged a music programme to notorious criminals at aforesaid Police Post. Thus the appellant had committed a gross professional misconduct, caused embarrassment to the disciplined department, for which departmental proceedings were initiated against him under the charges detailed in the charge sheet with statement of allegations. Hence, he was dealt with departmentally by the competent authority i.e respondent No. 3 under the relevant rules. Copy of FIR regarding target killing of Police officers is annexure A.

The allegations framed against the appellant were established by the inquiry officer and he was held guilty of the charges. Therefore, he was served with final show cause notice alongwith relevant documents. The reply to the final show cause notice filed by the appellant was found unsatisfactory as he failed to produce any plausible explanation during personal hearing.

1. Incorrect, the departmental proceedings were conducted against the appellant in accordance with the relevant rules. **The appellant himself admitted the music programme held in the Police Post and shown his presence in it.**
2. Incorrect, sufficient material is available on record, which established the illegal activity of the appellant and his misconduct. **Furthermore, the appellant himself admitted the illegal event in para No. 1 of memorandum of his appeal.**
3. The charges and allegations framed against the appellant were established during course of inquiry and respondent No. 3. On completion of all codal formalities, the appellant was held guilty of the charges / allegations and awarded punishment commensurate to the charges vide a speaking and well-reasoned order.
4. Irrelevant, however, the appellant was proceeded for his gross professional misconduct, which caused embarrassment to entire Police department.
5. Incorrect, a regular inquiry was conducted against the appellant wherein, he was associated with the proceedings, served with final show cause notice and heard in person by respondent No. 3.
6. Incorrect, reply is submitted in para No. 5.
7. Incorrect, the charges / allegations framed against the appellant have been established beyond any shadow of doubt.
8. Irrelevant, however, the legal order is passed in accordance with the rules and commensurate to the charges established against him.
9. The departmental appeal of the appellant was devoid of merits and correctly rejected by respondent No. 2.
10. The appellant is estopped to file the instant appeal for his own act and invalidly challenged the legal orders of respondents through unsound grounds.
11. Incorrect, reply is submitted in the above paras.
12. Incorrect, all codal formalities were fulfilled during the departmental proceedings.
13. Incorrect, para No. 13 of the memorandum of appeal is unjustified, the appellant mentioned unnecessary / frivolous words against other offices of the respondents, to which other officials have got no concerned and the orders were issued judiciously by the respondents.
14. **The appellant is estopped to file the instant appeal for his own conduct and admission of his guilt in his memorandum of appeal as well.**

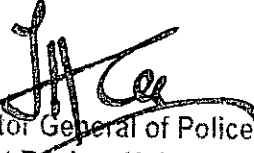
Grounds:-

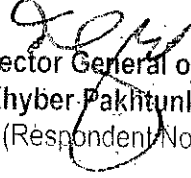
- a. Incorrect, a regular inquiry was conducted against the appellant. Question of examination of public does not arise as the people participated in music programme were notorious / criminals and the appellant alongwith other officials had also participated in illegal activity, which earned bad name to the entire department, caused embarrassment and he was a stigma on a disciplined department. Therefore, the appellant was awarded punishment commensurate to the charges established against him.
- b. Incorrect, the appellant was proceeded with departmentally in accordance with relevant rules, he filed reply to the charge sheet, final show cause notice and appeared for personal hearing before respondent No. 2 & 3.
- c. **The appellant again admitted the illegal activity conducted in Police Post and his presence as well. Thus the appellant does not deny his misconduct.**
- d. The appellant admitted his presence in the illegal activity, which established his intention for arranging the music programme in Police post.
- e. Incorrect, the orders are speaking one and the appellant was heard in person by respondent No. 3 while deciding the departmental proceedings and respondent No. 2 while disposing of his departmental appeal.
- f. The appellant was proceeded for departmentally for his own act and misconduct repeatedly admitted by him in his memorandum of appeal.
- g. Incorrect, the appellant was proceeded with departmentally under the relevant law and no question of his fundamental right under the constitution is arisen.
- h. Incorrect, the appellant is awarded punishment to the charge commensurate against him.
- i. Incorrect, the persons participated in a music programme were notorious criminals to whom the appellant and other officials had a links and with their consent a music programme was arranged in side of Police post.
- j. Incorrect, the appellant is not honest one, in view of his above gross professional misconduct.
- k. Incorrect, the appellant was dealt with departmentally in accordance with the relevant rules and all codal formalities were fulfilled during departmental process.
- l. Incorrect, a final show cause notice was issued to the appellant to which he filed a reply but found unsatisfactory by respondent No. 3. Thus the appellant filed a false statement in this para. Copy and reply to final show cause notice is annexure B & B-1.


- m. Incorrect, a legal and speaking orders were passed by the respondent No. 2 & 3.
- n. Incorrect, reply is submitted in the above paras.
- o. Incorrect, reply is submitted in above paras.

Prayer:-

In view of the above, stated facts and reasons, it is prayed that the appeal being devoid of merits may graciously be dismissed with costs.


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


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


District Police Officer,
Kohat
(Respondent No. 3)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 3190/2020
Nimat Khan ex-const: No. 499

..... Appellant


VERSUS

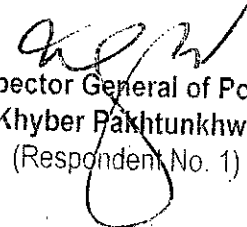
Inspector General of Police,
Khyber Pakhtunkhwa & others


..... 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
Kohat Region, Kohat
(Respondent No. 2)


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


District Police Officer,
Kohat
(Respondent No. 3)

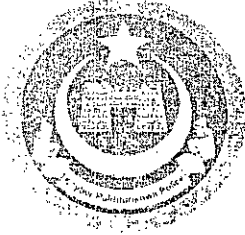
کاروں کا نام: اعلیٰ درجہ کی خدمت، دیکھ کر بہت براہ کرم لال پٹیل سیکرٹری ہونے پر
 مرحوم لال پٹیل کی خدمت میں ایڈریس: 9851513-9851513 کے ذریعہ کیا جاتا ہے۔ پیرس، فرانس
 سٹیٹ آرکائیو، پیرس ہے۔

پیرس
 30/10/2017
 03489414852

دستخط

محمد

اطلاع کے لیے اطلاع دہندہ کا دستخط ہوگا یا اس کی سرپرستانہ کیا جائے گا۔ اور اس کے تحت رہنمائی کے لیے اطلاع کا دستخط ہوگا۔ وہ صرف التسابیہ سرخ روشانی سے متعلق ہونا چاہیے۔
 ایک لکڑیاں شہر کی ترتیب دیکھ کر ہندوستان کے علاقہ کشمیر یا وسط ایشیا یا افغانستان جہاں ہندوستان کے پاس کوئی تعلق نہیں ہے۔



OFFICE OF THE
DISTRICT POLICE OFFICER,
KOHAT

Tel: 0922-9260116 Fax 9260125

No 44066/PA dated Kohat the 13/11 /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 Naimat Ullah No. 449** 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. 29044-45/PA dated 06.10.2019.

ii. On going, through the finding and recommendations of the inquiry officer, the material on record and other connected papers including your defense before the inquiry officer.

I am satisfied that you have committed the following acts/omissions, specified in section 3 of the said ordinance.

a. ***On 06.09.2019 a musical program had arranged to notorious proclaimed offender Anwar Hayat group at Police Post Sumari Bala.***

b. ***A video of the program was viral in which illegal activities are shown, but you did not informed your seniors regarding the illegal program and hide the facts, which shows your inefficiency and 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

13/11

جواب فائنل شوکار ٹوٹی

جواب شوکار ٹوٹی چارج منبانی کے لئے پوری انفرسٹرکچر کو لگا

صرف 19 لاکھ 44 ہزار کی بجائے صرف 10 کروڑ

یہ کہ جو انعامات فائنل شوکار ٹوٹی سے من سائل کے خلاف مانگے گئے

یہ بالکل غلط اور بے بنیاد ہیں

یہ کہ بلوائی رجسٹر نمبر 2 روز نامہ کے کئی سالوں میں سوئم ڈیوٹی جو

2 بجے رات سے صبح 6 بجے اور کئی اور ایجنسیوں پر گنہگار ہے بالکل

لاعلم تھا کیونکہ میری ڈیوٹی اس وقت نہیں تھی

یہ کہ جہاں تک میوزک پروگرام کے بارے میں تعلق ہے نہ تو من سائل

کامیاب اس ویڈیو میں موجود ہے اس پر یہ واقعہ کا علم تھا۔

یہ کہ من سائل نے اپنے تمام تر سروں کی ایک ہی انجمن میں سرانجام دی ہے اور Good Service دیکھا ہے۔

یہ کہ جناب انجمن والا جوڈ سے میرا تمام ڈیوٹی ریکارڈ طلب فرما سکتے ہیں جو میری بالکل ایسی کا ثبوت پیش کرتی ہے

یہ کہ جوڈ سے قبل بھی من سائل نے جوڈ پیش کیا ہے۔ جب میں من سائل نے بیان کیا کہ من سائل نے بعد از وقوعہ علم ہیوا اور ذہانی طور پر

جوڈی انچارج کو بتایا اور دیگر جوڈیات بڑی ہوشیاری سے پیش کی ہیں کیونکہ سائل پر کافی پریشر لیا گیا تھا

یہ کہ من سائل تمام تر معاملے میں بے قصور اور باگیاہ نہیں اور سرنگ ایڈکارڈ کی وجہ سے ناخوش ملوث کیا گیا ہے اور دیگر حقائق بوقت

Personal Hearing کی اجازت ملنے پر پیش کر دیں گے لیکن استدعا ہے کہ من سائل کے خلاف فائنل شوکار ٹوٹی کے بارے

احکامات صادر فرمائیں
لگاتار ان مقام خود

ATTESTED!

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

PROFORMA FOR EARLY HEARING

Form "A"

To be filled by the Counsel/Applicant

Case No.	Service Appeal No.3190/2020				
Case Title	Naimat Khan Vs. IGP, KP & others				
Date of Institution	2020				
Bench	SB		DB	✓	
Case Status	Fresh		Pending	✓	
Stage	Notice ✓	Reply	Argument		
Urgency to be clearly stated	The matter pertains to the service of the appellant as he has been imposed with a major penalty "removal from service". The appellant being the sole bread and butter earner for his family is suffering at the hands of respondents for no reason as the right of livelihood of appellant is at stake.				
Nature of the relief sought	As per prayer in main service appeal				
Next date of hearing	23.08.2022				
Alleged Target Date	First week of July, 2022.				
Counsel for	Appellant ✓	Respondent		In Person	

Signature of Counsel/Party

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

PROFORMA FOR EARLY HEARING

Form ~~10~~ 'B'

Inst#

Early Hearing 341 -P/2022

In Service Appeal No.3190/2020

Naimat Khan **Vs.** IGP, KP & others

Presented by **Syed Mudassir Pirzada** on behalf of **Appellant**. Entered in the relevant register.

Put up alongwith main case


~~REGISTRAR~~

Last date fixed	6/6/2022
Reason(s) for last adjournment, if any by the Branch Incharge.	DB not available
Date(s) fixed in the similar matter by the Branch Incharge	-
Available dates Reader/ Assistant Registrar Branch	28/7/2022

~~ASSISTANT REGISTRAR~~ ^m
13/7/22

~~REGISTRAR~~

Regretted,

 13/7/22. EW

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M No: _____/2022

IN

Service Appeal No: 3190/2020



Naimat Khan APPELLANT

VERSUS


IGP, Khyber Pakhtunkhwa & Others..... RESPONDENTS

APPLICATION FOR EARLY HEARING IN ABOVE TITLED CASE

Respectfully Submitted:

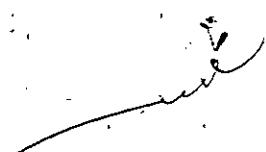
1. That the above mentioned service appeal is pending for adjudication before this tribunal which is fixed for 23/08/2022.
2. That the matter pertains to the service of the appellant as he has been imposed with a major penalty "Removal for Service". The appellant being the sole bread and butter earner for his family is suffering at the hands of respondent for no reason. The appellant right of livelihood is at stake therefore the early fixation is in the interest of justice.
3. That if the above appeal is not fixed early then the appellant may suffer irreparable loss.
4. That as the valuable right of the appellant has been involved in the matter. Therefore early Fixation, is in the interest of justice.

It is, therefore respectfully prayed that on acceptance of this application, the above titled service appeal may kindly be accelerated by fixing it on an earlier dates.


Applicant / appellant

Through

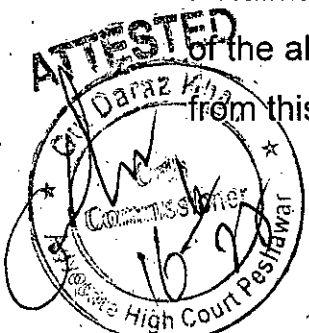
Dated: 16.006.2022


Syed Mudassir Pirzada
Advocate High Court

AFFIDAVIT

I Naimat Khan. (appellant) do hereby affirmed and declared that the content of the above application are true and correct and noting has been concealed from this Hon'ble Court.


Deponent





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

ORDER

This order will dispose of departmental enquiry conducted against Constable Khan Saleem No. 97 of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

Facts arising of the case are that on 06.09.2019 a musical program had arranged to notorious proclaimed offender Anwar Hayat group at Police Post Sumari Bala.

ii. A video of the program was viral in which illegal activities are shown, but he did not inform his seniors regarding the illegal program and hide the facts, which shows his inefficiency and gross misconduct on his part.

For the above, serious / professional misconduct of the accused official, charge sheet alongwith statement of allegations was served upon the accused official. SDPO Lachi, Kohat was appointed as enquiry officer to scrutinize the conduct of accused official. The Enquiry officer vide his report established the charge leveled against the defaulter official and recorded statements of the other relevant officials, which they have mentioned about music program inside PP Sumari has committed immoral, illegal and un-Islamic act of arranging music program intentionally inside PP Sumari in Muharram Ul Haram in collaboration with POs with whom he has relations.

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 26.11.2019 and afforded opportunity of defense but he failed to submit any plausible explanation. This speaks of professional misconduct and shows inefficiency in discharge of his lawful duty.

From the above, I have reached to the conclusion that the accused official being member of a disciplined force had developed relations with notorious PO gang and facilitated the gang, 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.

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 Khan Saleem No. 97 with immediate effect. **Kit etc issued be collected.**

DISTRICT POLICE OFFICER,
KOHAT

OB No. 1665

Dated 29-11-2019

No. SI057-60/PA dated Kohat the 29-11-2019.

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./L.O for clearance report

DISTRICT POLICE OFFICER,
KOHAT

ORDER.

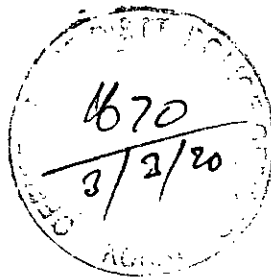
This order will dispose of a departmental appeal, moved by Constable Khan Saleem No. 97 of Operation Staff Kohat against the punishment order, passed by DPO Kohat vide OB No. 1665, dated 29.11.2019 whereby he was awarded major punishment of dismissal from service on the following allegations:-

- i. The appellant while posted at Police Post Sumari Bala arranged a musical program to notorious PO Anwar Hayat group at PP.
- ii. A video of the program was viral in which his presence / illegal activities are shown.
- iii. His illegal act caused embarrassment, damaged the image of Police and proved links / relations with a notorious PO group wanted in numerous heinous crimes including target killing of 04 Police officers.

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 27.02.2020. During hearing, he did not advance any plausible explanation in his defense to prove his innocence and just 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. Therefore, his appeal being devoid of merits is hereby rejected.

Order Announced
27.02.2020



[Handwritten Signature]
 (TAYYAB HAFEEZ) PSP
 Region Police Officer,
 Kohat Region.

No. 3250 /EC, dated Kohat the 3/3 /2020.

Copy to District Police Officer, Kohat for information w/r to his office Letter No. 2049/LB, dated 10.02.2019. His Service Roll & Fauji Missal / Enquiry File is returned herewith.

OH/RC
for final action
[Handwritten Signature]
 District Police Officer
 Kohat
 3/3/2020

[Handwritten Signature]
 (TAYYAB HAFEEZ) PSP
 Region Police Officer,
 Kohat Region.



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

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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 Khan Saleem No. 97 with immediate effect. **Kit etc issued be collected.**

DISTRICT POLICE OFFICER,
KOHAT

OB No. 1605
Dated 29-11-19

No. 51057-60/PA dated Kohat the 29-11-2019.

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./L.O for clearance report

DISTRICT POLICE OFFICER,
KOHAT

صیک
لانگھل
ریٹرنی
ایجوٹر

جواب فائل شوکا ز نوٹس

بحوال فائل شوکا ز نوٹس بحار یہ منجانب ڈسٹرکٹ پولیس آفیسر کوھاٹ نمبری PA/44067 مورخہ 13-11-2019 کی بابت معروض ہوں۔

- ۱۔ یہ کہ جواب ہذا سے قبل من سائل نے ایک عدد جواب بابت شوکا ز تحریر طور پر جمع کرایا تھا۔
- ۲۔ یہ کہ برطانیق فائل شوکا ز نوٹس میں من سائل پر جو الزامات عائد کیے گئے ہیں غلط اور بے بنیاد ہیں۔
- ۳۔ من سائل کا نشیبل ایک ذمہ دار اور ادنیٰ ماتحت اہلکار ہے۔ اور من سائل کا نشیبل نے جائے متعینہ جہاں پر باقاعدہ طور پر من کا نشیبل نے DSB انچارج جناب فہیم خان کو اطلاع دی کہ انچارج ساری بالا چوکی LHC نے موسیقی کا پروگرام چوکی ہذا میں شروع کیا تھا۔ اور سوبائل سنگٹل بوجہ محرم جام تھیں۔ لہذا افسران بالا کو اطلاع دی جائے۔
- ۴۔ من کا نشیبل Magzine دو نم پر متعینہ تھا۔ اور من کا نشیبل جو کہ ایک ادنیٰ اہلکار ہے نے کسی قسم کا کوئی Mis-conduct نہیں کیا۔
- ۵۔ جناب DSB انچارج کو طلب کر کے تصدیق کروا سکتے ہیں کہ سائل بالکل بے گناہ ہے۔ اور باقاعدہ اطلاع کی تھی انچارج کو جو جناب CDR نکلووا کر تسلی کروا سکتے ہیں۔

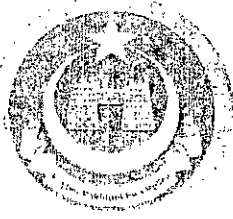
لہذا استدعا ہے کہ حسب ضابطہ مذکورہ فائل شوکا ز نوٹس کو فائل کرنے کے احکامات صادر فرمائیں۔

مورخہ 18-11-2019

العارضہ

خان سلیم بیٹ نمبر 97

Salim



OFFICE OF THE
DISTRICT POLICE OFFICER,
KOHAT

Tel: 0922-9260116 Fax 9260125

No 44068 /PA dated Kohat the 13/11/2019

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 Khan Saleem No. 97** 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. 29096-97/PA dated 08.10.2019.
- ii. On going, through the finding and recommendations of the inquiry officer, the material on record and other connected papers including your defense before the inquiry officer.

I am satisfied that you have committed the following acts/omissions, specified in section 3 of the said ordinance.

- a. *On 06.09.2019 a musical program had arranged to notorious proclaimed offender Anwar Hayat group at Police Post Sumari Bala.*
- b. *A video of the program was viral in which illegal activities are shown, but you did not informed your seniors regarding the illegal program and hide the facts, which shows your inefficiency and 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.

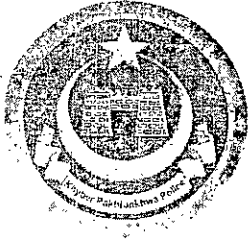
5. The copy of the finding of inquiry officer is enclosed.

بر دست کنیل منی اللہ سے ملے

DISTRICT POLICE OFFICER,
KOHAT

13/11

FA 3/11



OFFICE OF THE
DISTRICT POLICE OFFICER,
KOHAT

Tel: 0922-9260116 Fax 9260125

No 44068 /PA dated Kohat the 13 / 11 / 2019

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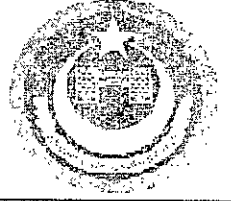
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DISTRICT POLICE OFFICER,
KOHAT

13/11

		$\frac{15000}{4} = 3750$	$\frac{100000}{1000} = 100$
<p>5 4 3 2 1</p>	<p>0.248322149 91 28194 91 250888 57029 426/5</p>	<p>01 01 01 02 03</p>	<p>100000 100000 100000 100000 100000</p>
<p>5/6</p>	<p>11-11-19</p>	<p>426</p>	<p>11-11-19</p>
<p>92</p>	<p>926</p>	<p>11-11-19</p>	<p>11-11-19</p>



ایس پی سی آر ایف پی ایس لاجی سرکس کو ہاٹ
ایس پی سی آر ایف پی ایس لاجی سرکس کو ہاٹ
0922-550010 فون نمبر: Usplachi@gmail.com

موری 2019-11-11

ریڈ نمبر: 426

بجانب :- جناب ڈسٹرکٹ پولیس آفیسر صاحب کو ہاٹ
عنوان :- فائٹنگ محکمہ انکوائری کاٹھیل خان سلیم نمبر 97 جو کی ساری بالا۔

جناب عالی!

کاٹھیل خان سلیم نمبر 97 متعینہ جو کی ساری بالا کو جناب DPO صاحب نے ذیل الزامات کے بناء پر چارج شیٹ نمبر 99/PA-29098 مورسی 08.10.2019 جاری کر کے ذیہ دستخطی کو انکوائری آفیسر مقرر کیا۔

الزامات:

- (i) مورسی 06.9.2019 کو مجرم اشتہاری انور حیات گروپ نے پولیس جو کی ساری بالا میں موسیقی کا پروگرام منعقد کیا تھا۔
- (ii) موسیقی پروگرام کی ویڈیو وائرل ہو کر جسمیں غیر قانونی سرگرمیاں نظر آ رہی ہے۔ لیکن آپ کاٹھیل نے اس غیر قانونی موسیقی پروگرام کے بابت اپنے بالا افسران کو اطلاع نہیں دی۔ اور حقائق کو چھپائے ہیں۔

تحقیقات:

- ☆ کاٹھیل خان سلیم نمبر 97 کو دوران انکوائری دفتر ہذا طلب کر کے مذکورہ کاٹھیل خان سلیم نے بیان کیا کہ وہ ایک ذمہ دار اور ادنیٰ ماتحت اہلکار ہے۔ جو کی انچارج LHC نے جو کی ہذا میں موسیقی کا پروگرام شروع کیا تھا۔ موسیقی پروگرام کے بابت انچارج DSB فہیم خان کو اطلاع دی تھی۔ (تحریری بیان لف کاروائی ہذا ہے)
- ☆ کاٹھیل خان سلیم نمبر 97 کے موبائل نمبر 03348322149 کا CDR حاصل کیا گیا۔ (CDR لف ہے)۔
- ☆ موسیقی پروگرام کی ویڈیو ریکارڈنگ چیک کیا گیا۔ جو کہ موسیقی پروگرام جو کی ساری بالا میں منعقد ہو چکی ہے۔ موسیقی پروگرام میں باصلاح افراد صاف نظر آ رہے ہیں۔
- ☆ SI نذر عباس سابقہ SHO تھانہ لاجی کو دفتر ہذا طلب کر کے جس نے تقلمد 21 مورسی 28.9.2019 تھانہ لاجی میں درج شدہ رپورٹ دہرایا۔ اور وضاحت کرتے ہوئے بیان کیا کہ موسیقی پروگرام میں مجرم اشتہاری عبدالقہار ولد صوبیدان شاہ مطلوبہ بمقدمہ علت 126 مورسی 14.5.017 جرم PPC30 تھانہ لاجی، مجرم اشتہاری ثناء اللہ ولد موہین سکند ساری پایان مطلوبہ بمقدمہ علت 606 مورسی 19.11.018 جرم PPC302/324 تھانہ لاجی باصلاح کا شکوف آئے تھے۔
- (تقلمد 21 مورسی 28.9.2019 تھانہ لاجی کا فونوٹیشن لف کاروائی ہذا ہے)۔

حقائق:

- (i) کاٹھیل خان سلیم نمبر 97 کے موبائل نمبر 03348322149 کے CDR سے پایا گیا۔ کہ موسیقی پروگرام کے بابت مذکورہ نے بروقت اپنے بالا افسران (SHO&DSP) کو اطلاع نہیں دی ہے۔ بلکہ اپنے ڈیفنس کے لئے مورسی 12.9.019 کو انچارج DSB فہیم خان کو اطلاع دی ہے۔ (CDR لف ہے)
- (ii) LHC ذہین شاہ کے سربراہی میں کاٹھیل خان سلیم نمبر 97 بمعہ کاٹھیل شیر زمان 3602 اور کاٹھیل نعمت خان 449 کے باہمی مشورے اور نیت مشترکہ سے جو کی ساری بالا میں موسیقی کے پروگرام کا انعقاد کیا گیا تھا۔ بذمہ افسران بالا کو اندھیرے میں رکھ کر بروقت اطلاع نہیں دی تھی۔
- (iii) موسیقی پروگرام میں مجرم اشتہاری عبدالقہار ولد صوبیدان شاہ مطلوبہ بمقدمہ علت 126 مورسی 14.5.17 جرم PPC302 تھانہ لاجی، مجرم اشتہاری ثناء اللہ ولد موہین سکند ساری پایان مطلوبہ بمقدمہ علت 606 مورسی 19.11.018 جرم PPC302/324 تھانہ لاجی باصلاح کا شکوف آئے تھے۔ جسکی گرفتاری نہ کرنا بھی دفعات PPC221/222 کے تحت قابل مواخذہ ہے۔

(3)

رائے انکوائری آفیسر:

کردہ انکوائری، ویڈیو ریکارڈنگ اور ریکارڈ سے کانسٹیبل خان سلیم نمبر 97 پر بحوالہ چارج شیٹ نمبر 8-99/PA مورخہ 08.10.2019 میں لگائے گئے الزامات درست ثابت ہو کر قصور وار پایا گیا۔ لہذا کانسٹیبل خان سلیم نمبر 97 کو درج بالا احقائق کے پیش نظر Major Punishment دینے کی سفارش کی جاتی ہے۔ رپورٹ برائے مناسب حکم پیش خدمت ہے۔

سب ڈویژنل پولیس آفیسر
لاچی سرکل کوہاٹ



No. 29098-99/PA

Office of the
District Police Officer,
Kohat

Dated 08-10-2019

2123/L
11-10-2018

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 Khan Saleem No. 97** 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. ***On 06.09.2019 a musical program had arranged to notorious proclaimed offender Anwar Hayat group at Police Post Sumari Bala.***
- ii. ***A video of the program was viral in which illegal activities are shown, but you did not informed your seniors regarding the illegal program and hide the facts, which shows your inefficiency and 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 07 days of the receipt of this Charge Sheet to the enquiry officer.

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

4. A statement of allegation is enclosed.

**DISTRICT POLICE OFFICER,
KOHAT**

11-10-2018

Saleem
11-10-2018



No. 29098-99/PA

Office of the
District Police Officer,
Kohat

Dated 08-10 /2019

DISCIPLINARY ACTION

I, **CAPT ® WAHID MEHMOOD, DISTRICT POLICE OFFICER, KOHAT** as competent authority, am of the opinion that you **Constable Khan Saleem No. 97** have rendered yourself liable to be proceeded against departmentally under Khyber Pakhtunkhwa Police Rule 1975 (Amendment 2014) as you have committed the following acts/omissions.

STATEMENT OF ALLEGATIONS

- i. **On 06.09.2019 a musical program had arranged to notorious proclaimed offender Anwar Hayat group at Police Post Sumari Bala.**
- ii. **A video of the program was viral in which illegal activities are shown, but you did not informed your seniors regarding the illegal program and hide the facts, which shows your inefficiency and gross misconduct on your part.**

2. For the purpose of scrutinizing the conduct of said accused with reference to the above allegations D.P. Laehi Waleed 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** W.M.

No. 29098-99/PA, dated 08-10 /2019.

Copy of above to:-

1. D.P. Laehi Waleed 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.

....

(2)

جواب چارج شیٹ

بحوالہ چارج شیٹ مجاریہ مجانب ڈسٹرکٹ پولیس آفیسر کوہاٹ مورخہ 08-10-2019 با نمبری 99-29098 کی بابت معروض ہوں۔

- ۱۔ یہ کہ برطابق چارج شیٹ متذکرہ بالا میں جو الزامات من سائل کانسٹیبل پر عائد کیے گئے ہیں۔ غلط اور بے بنیاد ہیں۔
- ۲۔ یہ کہ من سائل کانسٹیبل ایک ذمہ دار اور ادنیٰ ماتحت الہکارہ۔ اور من سائل کانسٹیبل نے جائے متعینہ جہاں پر باقاعدہ طور پر من کانسٹیبل نے DSB انچارج جناب فہیم خان کو اطلاع دی کہ انچارج ساری بالا چوکی LHC نے موسیقی کا پروگرام چوکی ہذا میں شروع کیا تھا۔ اور مو بائل سگنل بوجہ محرم جام تھیں۔ لہذا افسران بالا کو اطلاع دی جائے۔
- ۳۔ یہ کہ من کانسٹیبل Magzine دوئم پر متعینہ تھا اور من کانسٹیبل جو کہ ایک ادنیٰ الہکارہ ہے۔ نے کسی قسم کا کوئی Mis-conduct نہیں کیا۔
- ۴۔ یہ کہ جناب DSB انچارج کو طلب کر کے تصدیق کروا سکتے ہیں۔ کہ سائل بالکل بے گناہ ہے۔ اور باقاعدہ اطلاع کی تھی انچارج کو جو جناب CDR نکوا کر تسلی کروا سکتے ہیں۔

لہذا استدعا ہے کہ حسب ضابطہ چارج شیٹ مذکورہ کو فائل کرنے کے احکامات صادر فرمائیں۔

مورخہ 17-10-2019

العارض

Galeem

خان سلیم

پلٹ نمبر 97

0334-8322149

14301-7095462-3

نقل نو 21 روزنامہ 28/9/18

فصلی کرنا

نمبر 21

رپورٹ نذر عباس SAHO 28/9/18 وقت 2:00:18 بجے

درج ہے کہ ایک ویڈیو فوٹو ہوا ہے۔ جس میں شیخ شو
ڈھول بلے مارنے میوزک شو کا پروگرام ہے۔ اور کچھ
ملا شلوف سے لیں بننے بھی نظر آ رہے ہیں۔ جو تاج
رہے ہیں۔ اور افواہ ہے کہ ہماری چوکی میں دسویں کی رات
جب تمام ٹھانوں کے پولیس والے حرم کی جلوس میں

مہر و فحش۔ بیاباں پروگرام منعقد ہوئے۔ لہذا میں نے اس

ویڈیو کے بارے میں ویپر یفیکشن کر کے پایا گیا کہ دسویں

حرم کی رات چوکی ہماری میں طاہر ولد گل محمد شاہ
سکے ہماری پاپان کی شادی کی فوشی میں ٹھانوں کا اہتمام

ہوا گیا۔ یہ فورگروپ کے آدمی ہیں۔ یہ بھی معلوم ہوئے
کہ ہماری چوکی کے اہلکاروں میں سے کسی کے یہ دوست ہیں

اس پروگرام میں دو حرموں اشتہازی (1) محمد القہار ولد

صوبہ پسران شاہ مطلوب مقدم 126/17/19/18

(2) ثناء اللہ ولد محمد میں سکے ہماری پاپان مطلوب مقدم عدالت

19/9/18 حرم 302/321 جہانہ لائیو بھی ملا بشکلونوں کے ساتھ ماحول

جو خود تاج رہے ہیں۔ پولیس چوکی کے فرسٹ اور سائڈ پر
نکاس مانی واضح نظر آ رہی ہے۔ سرکاری کرسی بھی جن پر
دولت کو بٹھائے لوٹ نیچا رکھی جا رہی ہیں۔

RA
Issam Sharif
Ablet
Info. off. 158

5/10/18

35977104265
35977104265
35977104265

اگر یہ ویڈیو کسی نے والٹرڈ کی تو ہم کسی سے
نظر میں ملک کے لائق نہیں رہیں گے کیونکہ یہ ویڈیو
سمازی والوں کی یا کوئی بھیج گئی ہیں جس کے لئے
معلومات اکٹھی کرنے کے بعد جب یہ ویڈیو واقعی
سچ ثابت ہوئے تو ان سمازی والوں کے
فلسفہ و عقائد غیر دینی گھیناؤں شرمانہ حرکت
ثابت ہونے کے بعد یہ واقعہ سپرد قلم کرنا ہوں
یہ کسی معافی کے مستحق نہیں ہیں۔ اجازت کی دہرہ
دہری کی کہ اس نے اب تو مجھے اس واقعہ
سے باخبر ہوتے ہوئے بھی لاعلم رکھا۔ رپورٹ
درج کر کے انکو اثری کیلئے افسران یا لوگوں کو موصول ہائے

صباح عالی
نقل بمطابق اصول
28-2-19

Sir,
In this charge sheets
have already been issued &
Siddiqui has been appointed
as evening officer.
May please with em
file please.
W/S/O

1/2

IMEI	A Number	B Number	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
359771042657320	923348322149	923318975169	11/09/2019 17:59	11/09/2019 18:00	84	OUTGOING	VOICE	Sumairy Khattak - SUMAIRY KHATTAK
359771042657320	923348322149	923369672557	11/09/2019 18:02	11/09/2019 18:04	57	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923359980665	11/09/2019 18:04	11/09/2019 18:05	24	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923318975169	11/09/2019 18:11	11/09/2019 18:11	9	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923318975169	11/09/2019 18:11	11/09/2019 18:12	62	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923338084331	11/09/2019 18:48	11/09/2019 18:51	147	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923313364765	11/09/2019 19:44	11/09/2019 19:45	93	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923318975169	11/09/2019 20:21	11/09/2019 20:35	824	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923497027899	11/09/2019 20:37	11/09/2019 20:37	24	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923139490858	11/09/2019 20:55	11/09/2019 21:00	259	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348297947	12/09/2019 8:27	12/09/2019 8:28	108	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348917721	12/09/2019 8:45	12/09/2019 8:46	81	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923353737312	12/09/2019 8:47	12/09/2019 8:51	237	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923369727691	12/09/2019 8:53	12/09/2019 8:54	67	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348295791	12/09/2019 8:57	12/09/2019 8:58	63	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348917721	12/09/2019 8:58	12/09/2019 8:59	44	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348917721	12/09/2019 9:04	12/09/2019 9:05	31	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348917721	12/09/2019 9:09	12/09/2019 9:23	822	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923338084331	12/09/2019 9:33	12/09/2019 9:33	56	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923359980665	12/09/2019 9:51	12/09/2019 9:52	47	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923359980665	12/09/2019 9:54	12/09/2019 9:55	38	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923339611893	12/09/2019 10:09	12/09/2019 10:16	414	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923339602262	12/09/2019 10:16	12/09/2019 10:22	376	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923339611893	12/09/2019 10:27	12/09/2019 10:29	71	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923353737312	12/09/2019 11:06	12/09/2019 11:08	111	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348917721	12/09/2019 11:09	12/09/2019 11:14	341	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348295791	12/09/2019 11:18	12/09/2019 11:19	87	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348616941	12/09/2019 11:20	12/09/2019 11:21	77	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923339658752	12/09/2019 11:29	12/09/2019 11:30	42	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923354512000	12/09/2019 11:35	12/09/2019 11:37	107	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923354512000	12/09/2019 11:38	12/09/2019 11:38	33	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923329787401	12/09/2019 12:02	12/09/2019 12:02	46	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923339334765	12/09/2019 13:05	12/09/2019 13:06	66	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923369672557	12/09/2019 13:23	12/09/2019 13:26	161	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923338084331	12/09/2019 13:40	12/09/2019 13:41	44	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348321709	12/09/2019 13:43	12/09/2019 13:43	21	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923353737312	12/09/2019 13:44	12/09/2019 13:45	53	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348321709	12/09/2019 13:50	12/09/2019 13:51	80	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923318975169	12/09/2019 15:22	12/09/2019 15:35	771	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923369672557	12/09/2019 16:14	12/09/2019 16:15	56	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923365040947	12/09/2019 16:36	12/09/2019 16:42	371	OUTGOING	VOICE	Kohat - KOHAT

(Handwritten signature/initials)

3



CDR of Cell No.923348322149,CNIC No. Enquiry PS Lachi

IMEI	A Number	B Number	Call Start Time	Call End Time	Call Duration	Call Type	Type	Location - A
359771042657320	923348322149	923348295791	04/09/2019 8:06	04/09/2019 8:07	38	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923339629426	04/09/2019 8:11	04/09/2019 8:12	90	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348616941	04/09/2019 8:26	04/09/2019 8:26	36	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923318975169	04/09/2019 8:37	04/09/2019 8:40	207	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348917721	04/09/2019 8:44	04/09/2019 8:56	705	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923359368041	04/09/2019 9:01	04/09/2019 9:03	96	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923318975169	04/09/2019 14:18	04/09/2019 14:21	140	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923318975169	04/09/2019 19:54	04/09/2019 19:59	344	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923369619793	04/09/2019 20:13	04/09/2019 20:17	263	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923355744193	04/09/2019 20:18	04/09/2019 20:20	114	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923318975169	04/09/2019 20:21	04/09/2019 20:29	524	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923318975169	04/09/2019 20:30	04/09/2019 20:31	60	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348249451	04/09/2019 20:32	04/09/2019 21:01	1713	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348346188	04/09/2019 21:01	04/09/2019 21:06	294	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348274685	05/09/2019 6:11	05/09/2019 6:11	31	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923318975169	05/09/2019 7:07	05/09/2019 7:09	110	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923349520209	05/09/2019 7:10	05/09/2019 7:11	84	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923339658752	05/09/2019 7:40	05/09/2019 7:42	119	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923184146676	05/09/2019 11:15	05/09/2019 11:25	591	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923318975169	05/09/2019 11:25	05/09/2019 11:27	69	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348321709	05/09/2019 11:30	05/09/2019 11:35	321	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923318975169	05/09/2019 16:35	05/09/2019 16:46	629	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923318975169	05/09/2019 20:07	05/09/2019 20:16	554	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348917721	05/09/2019 20:17	05/09/2019 20:26	561	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923355744380	05/09/2019 20:46	05/09/2019 21:06	1190	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923323232431	05/09/2019 22:13	05/09/2019 22:25	767	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923313467168	05/09/2019 22:27	05/09/2019 22:32	297	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348249451	05/09/2019 22:32	05/09/2019 22:37	257	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348249451	05/09/2019 22:54	05/09/2019 22:55	11	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923348249451	05/09/2019 23:06	05/09/2019 23:34	1660	INCOMING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923318975169	05/09/2019 23:49	05/09/2019 23:51	121	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923343737312	06/09/2019 9:32	06/09/2019 9:38	382	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923343737312	06/09/2019 9:41	06/09/2019 9:41	29	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923343737312	06/09/2019 9:41	06/09/2019 9:42	38	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923318975169	06/09/2019 11:39	06/09/2019 11:42	160	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923357892245	06/09/2019 11:42	06/09/2019 11:47	296	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923369672557	06/09/2019 12:02	06/09/2019 12:04	108	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923369672557	06/09/2019 12:09	06/09/2019 12:11	106	OUTGOING	VOICE	Kohat - KOHAT
359771042657320	923348322149	923369727691	06/09/2019 15:58	06/09/2019 15:59	31	OUTGOING	VOICE	Sumairy Khattak - SUMAIRY KHATTAK
359771042657320	923348322149	923359368041	06/09/2019 17:08	06/09/2019 17:09	83	OUTGOING	VOICE	Kohat - KOHAT

Handwritten signature or mark in the bottom right corner.



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

ORDER

This order is passed on the departmental enquiry against the following Police official of this district under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

1. LHC Noor Nawaz No. 20
2. LHC Sohail No. 827
3. LHC Arif No. 3317 Elite force
4. LHC Nadeem 4239 Elite force
5. Constable Raheem No. 15
6. Constable Fayad Shah No. 415
7. Constable Khan Saleem No. 97
8. Constable Nasir No. 173
9. Constable Riayat Shah 2926 Elite force
10. Constable Adnan 77/ PC
11. Constable Izat Khan 253 Wireless Operator PS MRS
12. SPF Constable Ameer Abbas No. 30
13. Constable Rifaqat No. 49
14. Constable Fayaz Ud Din No. 66 of Inv: Staff Kohat
15. Driver Constable Naeem No. 26

Brief facts of the case are that on 30.01.2019 ASP Saddar, Kohat counted the strength of PS MRS where they were found absent from their official duties without any leave or permission of the competent authority. This act show gross misconduct on their part.

They were served with Show Cause Notices, reply of the Show Cause Notices was received and found unsatisfactory. They were also called in OR and heard in persons.

In view of above I, Capt @ Wahid Mehmood, District Police Officer, Kohat in exercise of the powers conferred upon me, award them a minor punishment of "one day absence period is treated as leave without pay" and administered warning.

DISTRICT POLICE OFFICER,
KOHAT 17/4

OB No. 475

Date 17-04-2019

No. 5126-30/PA dated Kohat the 18-4-2019.

Copy of above to the:-

1. SP, Investigation Wing, Kohat
2. DSP Elite Force Kohat
3. Reader/SRC/OHC/Pay officer for necessary action

DISTRICT POLICE OFFICER,
KOHAT 17/4

بیانِ اعلانِ کاروبار - رقم 97
FC

جناب عالی!

حوالہ شوکار ٹوئس نمبری 2983/PA مروضہ خدشات

یوں ہے کہ سائل $\frac{PS}{MRS}$ میں لائڈر ڈ لوٹس پرنٹنگ

ہے جو کہ بیج 80.00 روپے اور 200.00 روپے

سائل کو ہدف $3\frac{1}{19}$ کو وقت 54 بجے

کو گنتی میں غیر حاضر کیا گیا۔

جبکہ سائل اپنی بیک میں موجود تھا۔ سائل کو کل

دائٹس میں نہیں رکھنا۔ جناب صاحب سے اس کا

ہے کہ شوکار ٹوئس داخل دفتر کیا جائے۔

میرا بیان ہے جو فقہائے اہل سنت سے ہے۔

Al Saleem
25/3/2019

OFFICE OF THE DISTRICT POLICE OFFICER KOHAT

SHOW CAUSE NOTICE

(Under Rule 5(3) KPK Police Rules, 1975)

1. That You 97 [Signature] have rendered yourself liable to be proceeded under Rule 5 (3) of the Khyber Pakhtunkhwa, Police Rules 1975 (Amendment 2014) for following misconduct;
 - i. On 30.01.2019 ASP Saddar, Kohat counted the strength of PS MRS where you 97 [Signature] was found absent from your official duty without any leave or permission of the competent authority. Your this act show gross misconduct on your part.
2. That by reason of above, as sufficient material is placed before the undersigned, therefore it is decided to proceed against you in general Police proceeding without aid of enquiry officer:
3. That the misconduct on your part is prejudicial to good order of discipline in the Police force.
4. That your retention in the Police force will amount to encourage in efficient and unbecoming of good Police officers.
5. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the rules.
6. You are, therefore, called upon to show cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 (Amendment 2014) for the misconduct referred to above.
7. You should submit reply to this show cause notice within 07 days of the receipt of the notice failing which an ex-parte action shall be taken against you.
8. You are further directed to inform the undersigned that you wish to be heard in person or not.
9. Grounds of action are also enclosed with this notice.

No. 2983/PA

Dated 18-3-2019

DISTRICT POLICE OFFICER,
KOHAT 18/3.

[Signature]

تاریخ 08/06/09 سے 17/06/09 تک کے ذرائع

مادہ نمبر

اسٹیشن	ASi	مادہ نمبر	تاریخ
اسٹیشن	01	01	03
اسٹیشن	-	01	-
اسٹیشن	-	-	-
اسٹیشن	-	-	-
اسٹیشن	01	02	03

ذرائع کے بارے میں
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نام اطلاع دینے والے وقت

01 آغاز ذرائع جاوید علی Asi ورثہ 06/09/09 وقت 18:00 بجے اس وقت کوکریاں ہلا زمان ہلا گئی
 کیا جا کر حمد خان کو وقت مطابق رجسٹر کارڈ دیا گیا اور اس وقت کوکریاں ہلا گئی
 02 حادثہ ایوارڈ Asi ورثہ 06/09/09 وقت 18:00 بجے اس وقت کوکریاں ہلا گئی
 میں جاوید علی Asi ورثہ 06/09/09 وقت 18:00 بجے اس وقت کوکریاں ہلا گئی
 وقت خان 49، خان سیم 97 جو رخصت ہوئے اور کوکریاں ہلا گئی
 آغاز ذرائع 03/09/09 سے پورا ٹریک پر ہے۔ حادثہ ایوارڈ کے لئے
 03 کوکریاں ہلا زمان Asi ورثہ 06/09/09 وقت 18:00 بجے اس وقت کوکریاں ہلا گئی
 ذریعہ لگائی گئی۔ لیکن بین ڈیوٹی اول نمبر 3602، دوئم نمبر 3603، سوم
 نمبر 3604، چار نمبر 3605، پانچ نمبر 3606، چھ نمبر 3607، سات نمبر 3608، آٹھ نمبر 3609، نو نمبر 3610، دس نمبر 3611
 وقت خان لگائی جا کر گنتی میں سنائی و سمجھائی رہے گی۔

04 گنتی ہلا زمان Asi ورثہ 06/09/09 وقت 18:00 بجے اس وقت گنتی ہلا زمان ایگن کارڈ اور ڈیوٹی ہلا گئی
 گنتی میں موجود رہے گی۔ کوکریاں ہلا زمان ہلا گئی اور گنتی میں سنائی و سمجھائی رہے گی
 ضروری حکم اطلاع دینے پر ذرا سیٹ ہوگی

اطلاع / آفیسر فیض مہرا ڈیوٹی Asi ورثہ 06/09/09 وقت 18:30 بجے اس وقت گنتی
 ہلال 932 سے سب سے پہلے کارڈ دیا گیا اور فیض مہرا کو حرام ڈیوٹی اطلاع
 دی اور پھر چوکی ہذا کو آکر خبریت بیان کی تاکہ حرام چوکی میں ہوگا

سب اچھا رپورٹ Asi ورثہ 07/09/09 وقت 18:00 بجے اس وقت گنتی
 گنتی گنتی خبریت سے لگنے والی گنتی کا ناٹو ٹیبل 01/09/09 سے
 اسٹیشن ہلا زمان خود اپنے اپنے ڈیوٹی پر تیار رہے گی