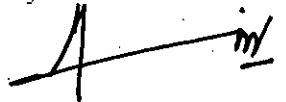


# FORM OF ORDER SHEET

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

Appeal No. \_\_\_\_\_

1737/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/08/2023	<p>The appeal of Mr. Zafran Ullah is presented today by Mr. Taimur Ali Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>31-08-2023</u>.</p> <p>By the order of Chairman  REGISTRAR</p>

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

1737  
SERVICE APPEAL NO. \_\_\_\_\_/2023

Zafran Ullah

VS

Police Department

**INDEX**

S.No.	Documents	Annexure	P. No.
1	Memo of Appeal	-----	01-04
2	Affidavit	-----	05
3	Copy of appreciation certificate	A	06
4	Copies of charge sheet along with the statement of allegations and reply	B&C	07-09
5	Copy of inquiry	D	10-12
6	Copies of show cause notice and reply	E&F	13-14
7	Copy of removal order dated 07.12.2021	G	15
8	Copies of departmental appeal, order dated 25.03.2022 revision, application and order dated 09.02.2023	H,I,J,K&L	16-20
9	Copy of order dated 04.01.2021	M	21-22
10	Vakalat Nama	-----	23

THROUGH:

APPELLANT



TAIMUR ALI KHAN  
(ADVOCATE HIGH COURT)

Cell# 0333-9390916

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

SERVICE APPEAL NO. 1737/2023

Zafran Ullah, Ex-Constable No.4542,  
District Security Branch, Peshawar.

(APPELLANT)

VERSUS

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. The Capital City Police Officer, Peshawar.
3. The Senior Superintendent of Police, (Operation) Peshawar.

(RESPONDENTS)

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APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 07.12.2021, WHEREBY MAJOR PUNISHMENT OF REMOVAL FROM SERVICE WAS IMPOSED UPON THE APPELLANT, AGAINST THE ORDER DATED 25.03.2022, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS REJECTED AND AGAINST THE ORDER DATED 09.02.2023 RECEIVED BY THE APPELLANT ON 17.08.2023, WHEREBY THE REVISION OF THE APPELLANT WAS ALSO REJECTED FOR NO GOOD GROUNDS.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 07.12.2021, 25.03.2022 AND 09.02.2023 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED INTO HIS SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY, WHICH THIS HONORABLE TRIBUNAL DEEMS FIT AND APPROPRIATE THAT, MAY ALSO, BE AWARDED IN FAVOUR OF APPELLANT.

**RESPECTFULLY SHEWETH:**

**FACTS:**

1. That the appellant was appointed in the respondent department as Constable and has completed mandatory training and has performed his duty with great devotion and honesty, whatsoever assigned to him and no complaint has been filed against him regarding his performing.
2. That the appellant was performing his duty in District Security Branch, Peshawar and has received commendation certificate with cash reward for his excellent performance. **(Copy of appreciation certificate is attached as Annexure-A)**
3. That the appellant while performing his duty in such capacity, charge sheet along with statement of allegations were issued to the appellant which was properly replied by the appellant in which he denied the allegations and gave the real facts about the issue. **(Copies of charge sheet along with the statement of allegations and reply are attached as Annexure-A&B)**
4. That inquiry was conducted against the appellant in which no proper opportunity of defense was provided to the appellant as neither statements were recorded in the presence of the appellant nor gave him opportunity of cross examination, but despite the inquiry officer recommended him for major punishment. **(Copy of inquiry is attached as Annexure-C)**
5. That show cause notice was issued to the appellant which was replied by the appellant in which he again denied the allegations and gave facts about the issue. **(Copies of show cause notice and reply are attached as Annexure-D&E)**
6. That on the basis of above allegations and without conducting regular and proper inquiry to dig out the reality about the allegations, the appellant was removed from service vide order dated 07.12.2021. **(Copy of removal order dated 07.12.2021 is attached as Annexure-F)**
7. That the appellant filed departmental against dismissal order dated 07.12.2021, which was rejected on 25.03.2022. The appellant then filed revision on 28.03.2022, which was also rejected on 09.02.2023 for no good grounds, however, the rejection order dated 09.02.2023 was never communicated to the appellant and the appellant received the rejection order dated 09.02.2023 through an application dated 17.08.2023. **(Copies of departmental appeal, order dated**

25.03.2022 revision, application and order dated 09.02.2023 are attached as Annexure-G,H,I,J&K)

8. That the appellant has no other remedy except to file the instant appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

**GROUND:**

- A) That the impugned orders dated 07.12.2021, 25.03.2022 and 09.02.2023 are against the law, facts, norms of justice and material on record, therefore, not tenable and liable to be set aside.
- B) That no proper and regular inquiry was conducted against the appellant because no opportunity of defense was provided to the appellant as neither statements were recorded in the presence of the appellant nor gave him opportunity of cross examination, which is violation of law and rules and such the impugned order is liable to be set aside on this ground alone.
- C) That inquiry officer mainly relied on the statement of SI Zulfiqar ASHO Jumrad and SI Zia Ullah Khan IO without conducting proper and regular inquiry to dig out the reality about the allegations and gave it finding on presumption basis, which is not permissible under the law.
- D) That the appellant was arrayed in the case vide FIR No.319 dated 09.09.2021 u/s 9D, 13 KPK Act 15AA, 109, 419, 468, 471, 420 P.S Jamrud on the basis of statement of accused namely Najeeb Ullah u/s 163, however, the appellant was discharged by the competent Court of law on 04.01.2021 on the basis that beside the statement of co-accused, no evidence is available against the Zafran (appellant). **(Copy of order dated 04.01.2021 is attached as Annexure-L)**
- E) That no corroborative evidence was present against the appellant and due to that reason the competent court of law discharge him, but respondent department took action against the appellant on presumption basis which is against the norms of justice and fair play.
- F) The appellant who was arrayed in the case vide FIR No.319 dated 09.09.2021 u/s 9D, 13 KPK Act 15AA, 109, 419, 468, 471, 420 P.S Jamrud on the basis of statement of accused namely Najeeb Ullah u/s 163, however, he was discharged by the competent Court of law on 04.01.2021 on the reason that no evidence is available against the Zafran (appellant), therefore, there remain no ground to penalize the appellant.

- G) That the appellant has not been treated in accordance with law and rules and has been condemned unheard throughout.
- H) That the appellant seeks permission of this Honorable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that on the acceptance of this appeal, the order dated 07.12.2021, 25.03.2022 and 09.02.2023 may kindly be set aside and the appellant may be reinstated into his service with all back and consequential benefits. Any other remedy, which this honorable tribunal deems fit and appropriate that, may also, be awarded in favour of appellant.

  
APPELLANT  
Zafran Ullah

THROUGH:

  
(TAIMUR ALI KHAN)  
ADVOCATE HIGH COURT

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

SERVICE APPEAL NO. \_\_\_\_\_/2023

Zafran Ullah

VS

Police Department

**AFFIDAVIT**

I, Zafran Ullah, Ex-Constable No.4542, District Security Branch, Peshawar, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honorable Tribunal.

  
DEPONENT

46

CAPITAL CITY POLICE PESHAWAR



COMMENDATION CERTIFICATE

Class II  
Is awarded to

Mr. ZAFRAN No. 4542/PK S/O

R/O D.S.B

In Recognition of

His excellent performance of duty in case vide PIR No. 277 dt 17.9.21 U/S 11c/190crs

He is awarded cc II alongwith cash reward of Rs. 2000/-

OR No 2384  
DATED 13/9/2021

CAPITAL CITY POLICE OFFICER  
PESHAWAR

ATTSTED



CHARGE SHEET

B. (7) 3

1. Whereas I, Yasir Afridi PSP, SSP/Operations Peshawar, am satisfied that a Formal Enquiry as contemplated by Police Rules 1975 is necessary & expedient in the subject case against Constable Zufran Ullah No. 4542 of District Security Branch District Peshawar.
2. And, whereas, I am of the view that the allegations if established would call for major/minor penalty, as defined in Rule 3 of the aforesaid Rules.
3. Now therefore, as required by Rule 6 (1) (a) & (b) of the said Rules, I, Yasir Afridi PSP, SSP Operations, Peshawar hereby charge you Constable Zufran Ullah No. 4542 of District Security Branch District Peshawar under Rule 5 (4) of the Police Rules 1975 on the basis of following allegations/grounds:

It has been learnt from reliable sources that you while posted in District Security Branch, Peshawar were hand in gloves with organized criminals and drug paddlers similarly you were reportedly patronizing your illegal activities with the intention for personal gain. Being a member of the disciplined force, your above act comes within the ambit of corruption and is highly objectionable and render you liable for disciplinary proceedings under Police (Efficiency & Disciplinary) Rules, 1975.

4. I hereby direct you further under Rule 6 (1) (b) of the said Rules to put forth written defence within 7 days of the receipt of this Charge Sheet to the Enquiry Officer, as to why action should not be taken against you and also stating at the same time whether you desire to be heard in person.
5. In case your reply is not received within the specific period to the Enquiry Officer, it shall be presumed that you have no defence to offer and ex-parte action will be taken against you.

20  
YASIR AFRIDI PSP  
Senior Superintendent of Police,  
(Operations) Peshawar

No. 2643 E/PA

dated Peshawar the 10/09/2021.

PA

For Process

ATTSTED

Sp. Combr

(8)

**STATEMENT OF ALLEGATIONS**

1. I, Yasir Afridi PSP, SSP/Operations Peshawar as competent authority, am of the opinion that **Constable Zufran Ullah No. 4542 of District Security Branch 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.

It has been learnt from reliable sources that he while posted in District Security Branch, Peshawar were hand in gloves with organized criminals and drug paddlers similarly he was reportedly patronizing his illegal activities with the intention for personal gain. Being a member of the disciplined force, his above act comes within the ambit of corruption and is highly objectionable and render himself liable for disciplinary proceedings under Police (Efficiency & Disciplinary) 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 Cantt. 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.

No. 663 E/PA, dated Peshawar the

20  
**YASIR AFRIDI** PSP  
Senior Superintendent of Police,  
(Operations) Peshawar  
10/09/2021

**ATTSTED**

جناب عالی!

99

حوالہ چارج شیٹ نمبری 643 E/PA مورخہ 22/09/10 معروف خدمات ہوں۔

کہ من ڈسٹرکٹ سکریٹری برانچ میں تعینات ہے۔ اور اس میں تعیناتی کے دوران تھانہ کے سطح پر ایک اور بعض اوقات ایک کانسٹیبل کو کئی تھانے بھی حوالہ کیے جاتے ہیں۔ جہاں سے وقوعہ کے متعلق انفارمیشن کیساتھ ایڈوائس انفارمیشن آرگنائزڈ کرائمز کے متعلق سروسز سے بذریعہ موبائل فون کال، واٹس ایپ اور دیگر کمیونیکیشن ذرائع سے رابطہ کیے جاتے ہیں۔ ایک تھانہ یا بعض اوقات کئی تھانوں کی انفارمیشن کیلئے بروقت پہنچنا مشکل ہوتا ہے۔ جس کے لیے فون و دیگر کمیونیکیشن ذرائع استعمال کیے جاتے ہیں۔ چونکہ سیاسی اور مذہبی جلسوں اور وقوعہ کے متعلق انفارمیشن تو میر کسی سے حاصل کی جاسکتی ہے۔ لیکن آرگنائزڈ کرائمز منشیات فروش، اشتہاریوں کے متعلق معلومات، سمگلروں کے متعلق معلومات اور قمار بازوں اور دیگر حساس معلومات ان سے وابستہ سروسز سے ہی حاصل کیے جاسکتے ہیں۔ اور جس سے صرف بذریعہ فون، واٹس ایپ وغیرہ رابطہ ممکن ہے اور من نے اس سلسلے میں آرگنائزڈ کرائمز کے متعلق سروسز سے ہی معلومات حاصل کر کے افسران بالا کے ذریعہ پیش کر کے جس پر تھانوں کے ذریعہ افسران بالا ہی کی احکامات کے تحت کارروائیاں ہو چکی ہیں۔

جناب عالی! من نے صرف ٹھکے کے نیک نامی اور اپنے ضلع کو منشیات پاک کرنے کیلئے سروسز سے رابطہ کیے ہیں۔ اس کے علاوہ من سائل نے نہ تو منشیات فروش سے ذاتی فائدہ سا رابطہ کیے ہیں اور نہ ہی منشیات فروش کو فائدہ پہنچانے کیلئے اپنے اختیارات کا استعمال کیا ہے۔ اور نہ کسی منشیات فروش کی کہیں سفارش کی ہے اور نہ ہی ان کو کہیں فائدہ پہنچانے کی کوشش کی ہے۔

من سائل حلفیہ طور پر بیان دیتا ہوں کہ مندرجہ بالا عقائد بالکل درست اور ایمانداری کے تحت ہے۔

العارض

آپ کا مخلص زعفران اللہ کا انسپل بیٹ نمبر 4542

ATTSTED

**INDING U/R 6(5) OF POLICE RULES 1975, (AMENDED 2014)**  
**AGAINST FC ZAFRAN NO. 4542**

D 10 (6)

The enquiry in hand was referred to this officer to ascertain the misconduct, committed by FC Zafran-No. 4542 vide order of enquiry No 643/E/PA dated 10.09.2021.

FC Zafran ullah No. 4542 was issued charge sheet and statement of allegations, which contained following allegations:

- It has been learnt from reliable sources that he, while posted in District Security Branch, Peshawar were hand in gloves with organized criminals drug peddlers. Similarly he was reportedly patronizing his illegal activities with the intention for personal gain. Being a member of the disciplined force, his above act comes within the ambit of corruption and is highly objectionable and render himself liable for disciplinary proceedings under police (Efficiency & Disciplinary) Rules, 1975.

**ENQUIRY PROCEEDINGS:**

To inquire the matter and unearth the real facts, undersigned called the following persons and recorded their statements and cross examined them as well.

1. FC Zafran No. 4542
  2. SI Zia Ullah (I.O of case FIR No. 319/2021 u/s 9-DCNSA/13 KPK/15-AA/109/419/468/471 PS Jamrud).
  3. SI Zulfiqar Khan (ASHO PS Jamrud)
- Moreover, audio recordings provided by ASHO Zulfiqar PS Jamrud were also examined.

**STATEMENT OF FC ZAFRAN NO. 4542**

Constable Zafran said in his statement that the allegations against him are baseless and there is no truth in it but the accused in case FIR No. 319/2021 u/s 9-DCNSA/13 KPK/15-AA/109/419/468/471 PS Jamrud was his informer and on his information he identified several drug dealers and its diary has been provided to the senior officers in time and action was taken against many drug dealers on that information. For this reason, he tried to justify his contacts with the accused.

ATTSTED

(11)

**STATEMENT OF SI ZULFIQAR ASHO PS JAMRUD**

SI Zulfiqar stated that on 09.09.2021 accused Najib was arrested with a motorcar and 10 grams of heroin was recovered from his possession. The accused was interrogated and another 6 kg of heroin and equipment for producing drugs was recovered from his Hujra.

During search, three mobile phones were recovered from the possession of the accused. There was a CDR in the WhatsApp chat of accused Najeesh. He was asked about the CDR that who sent it to which he replied that it was sent by his friend Zafran who is a constable in the police department. Further checking of the mobile phone found many links of the accused with Zafran. The accused also had audio recordings in his mobile phone which informed him about the police raids. Based on the evidence before IO, Constable Zafran was also charged under Section 109 PPC. Constable Zafran managed BBA from the honorable court. Constable Zafran has been found to be the facilitator of the above accused.

**STATEMENT OF SI ZIA ULLAH KHAN I.O**

SI Zia Ullah Khan stated that on 09.09.2021 accused Najib was arrested by ASHO PS Jamrud with a motorcar and 10 grams of heroin was recovered from his possession. The accused was interrogated and another 6 kg of heroin and equipment for producing drugs recovered from his Hujra.

During search, three mobile phones were recovered from the possession of the accused. There was a CDR in the WhatsApp chat of accused Najeesh. He was asked about the CDR that who sent it to which he replied that it was sent by his friend Zafran who is a constable in the police department. Further checking of the mobile phone found many links of the accused with Zafran. The accused also had audio recordings in his mobile phone which informed him about the police raids. Based on the evidence before IO, Constable Zafran was also charged under Section 109 PPC. Constable Zafran managed BBA from the honorable court.

ATTSTED


12

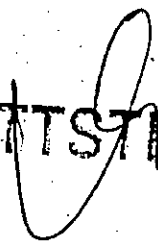
After going through the statement, verbally cross examining the constable and enquiring into the matter, the undersigned reached the following conclusion;

1. The presence of voice messages as well as CDR in the WhatsApp chat with the accused confirm constable Zafran links with narcotics dealer, Najeeb.
2. The audio messages shown by IO of case prove that Zafran had close links with drug dealers and informed them about police action in a timely manner.
3. The allegations made against Constable Zafran are correct and there is ample evidence to suggest that indeed he had established links with narcotics dealer Najeeb and shared sensitive information with him thus aiding in criminal activity.

**RECOMMENDATION**

Keeping in view the aforementioned findings, FC Zafran No. 4542 is hereby recommended for major punishment.

  
**AHMED ZUNAIR CHEEMA (PSP)**  
 SUPERINTENDENT OF POLICE,  
 CANTT PESHAWAR

  
**ATTSTED**



OFFICE OF THE  
SENIOR: SUPERINTENDENT OF POLICE,  
(OPERATIONS),  
PESHAWAR  
Phone. 091-9213054


E (13)

No. 2662 /PA

Dated Peshawar the 19/11, 2021

**FINAL SHOW CAUSE NOTICE**  
**(Under Police Disciplinary Rules, 1975)**

1. I, Senior Superintendent of Police, Operations, Peshawar as competent authority, under the Police disciplinary Rules 1975, do hereby serve you Constable Zafran No. 4542 while posted to DSB District Peshawar as follows:-
2. (i) That consequent upon the completion of enquiry committee conducted against you by CCP Peshawar, who found you guilty of the charges for which you were given the opportunity of personal hearing.  
(ii) Ongoing through the findings and recommendations of the inquiry officer, the material on record and other connected papers including your defense before the said officers:  
I am satisfied that you have committed the follow misconducts:  
  
You have been found guilty of the charges already communicated to you vide this office charge sheet bearing No. 643/E/PA dated 10.09.2021.
3. As a result thereof I, as Competent Authority decided to impose upon you major/minor penalty including dismissal from service under the said Rules.
4. You are, therefore, require to Show Cause as to why the aforesaid penalty should not be imposed upon you.
5. If no reply to this notice is received within 7-days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.
6. You are at liberty to be heard in person, if so wished.

  
HAROON RASHID KHAN (T.S.T P.S.P.)  
Senior Superintendent of Police  
(Operations) Peshawar

ATTSTED

حوالہ شمیلہ نائٹیل شوپاز فوشس نہایت ادب  
کیساتھ معروضی خدمت ہوئی۔ کہ من سائل نے قبل ازیں دوران  
انکو انٹری مفصل بیان ہی ہے جو کہ تامل ملاحظہ ہے۔ جس میں  
سائل کوئی تحریف نہیں کرتا چاہتا ہے۔

بحر حال یہ افر تامل ذکر ہے۔ کہ خارج شہ میں مندرجہ الزامات  
غلو نہیں اور میں ٹائٹل پر مبنی ہے۔ کوئی نہ جو بھی انکار

DSB میں ڈیوٹی سر انجام دیتا ہے۔ اس کا ضرور بحران اور

معلقہ کے شہر سندھ کیساتھ کسی طرح تبدیلی فونڈ

روا بطور ہے۔ کوئی نہ اس کے بطور کو Good Work نہیں

ہو سکتا۔ اور ان ہی روایت کی بنیاد پر من سائل کے متعدد

ڈاٹ ڈیٹ ان اور ضروری کو گرفتار کیے ہیں۔ جنگی

بنیاد پر سائل کو ان میں مال کے توصیفی اسناد اور نقد

انعامات دینے ہیں۔ جو کہ لفظ ہیں۔

سائل نے بد داغ ملازمت انجام دی ہے۔ اور ہمیں کہنے ڈیوٹی

انہما نداری اور حلو میں نہت کیساتھ انجام دی ہے۔ سائل کا

ان بحران کیساتھ سے روایت بھی آسکی آئی ہے۔ کوئی نہ

مہر و روایت کے علاوہ کوئی دوسرا ٹکوس نہیں ہے۔ جو

کہ سائل کی زندگی یا بد عنوانی کی سبب سے

اس لئے درخواست ہے۔ کہ وہ بلا حقیقت کے

بیش نظر سائل کے خلاف ہی رہا انکو انٹری کو داخل دفتر نماز شکر  
فرمائیں۔

ATTACHED

ایمان آباد سائبر سائبر اللہ شہر 2454



9  
G (15)



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


ORDER

This office order will dispose off the departmental proceedings against Constable Zufran Ullah No. 4542 while posted in DSB CCP Peshawar was placed under suspension by the undersigned on account of reliable sources that he while posted in District Security Branch, Peshawar were hand in gloves with organized criminals and drug peddlers, similarly, he was reportedly patronizing his illegal activities with the intention for personal gain.

2. Under Police Rules 1975 (amended 2014) proper charge sheet along with summary of allegation were issued against him and SP Cantt was appointed Enquiry Officer who submitted a finding on dated 16.11.2021 concluded that the matter was enquired secretly and it was found the allegations against him stand prove.

3. Keeping in view of the above, the undersigned being a competent authority, do agree with the recommendation of the enquiry officer, therefore Constable Zufran Ullah No. 4542 is hereby awarded the major punishment "Removal from Service with immediate effect."


Order announced.

  
HAROON RASHID KHAN (T.S.T P.S.P.)  
Senior Superintendent of Police  
(Operations) Peshawar

No. 2933-38 PA dated Peshawar, the 07/12/2021.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. Superintendent of Police, Cantt CCP Peshawar.
3. SP HQrs CCP Peshawar
2. OASI, CRC, PO
3. EMC along with complete enquiry file for record (30).

ATTSTED  


محرمیت حساب کی پیشگی اطلاعیں اور ایف بی آئی کے جواب

معمولہ حکیمانہ ایس ایس ایف حکم نمبر PA 38/33-2933

تاریخ 12/7/77ء کی ماہنامہ پریس میں شائع شدہ

”Removal“ کی سہرا دہکتی ہے۔

حاجی عالی سے سب سے پہلے عرض کیا گیا ہے۔

1۔ یہ کہ سب سے پہلے ایف بی آئی کے حکم نمبر DSB میں تصدیقات کیا۔ اور پھر  
قیام حیات ایف بی آئی کے ڈیوٹی دیا گیا تھا۔

2۔ دوران ڈیوٹی کے دوران ایف بی آئی کے حکم نمبر پر مبنی جوئے الزامات کے بارے  
میں ایف بی آئی کے حکیمانہ ایس ایس ایف سے شروع ہو کر آخر کار سب سے پہلے سوال اردو  
معمولہ ایف بی آئی کے حکم نمبر پر دہکتی ہے۔

3۔ یہ کہ سب سے پہلے ایف بی آئی کے حکم نمبر پر مبنی جوئے الزامات کے بارے  
میں ایف بی آئی کے حکیمانہ ایس ایس ایف سے شروع ہو کر آخر کار سب سے پہلے سوال اردو  
معمولہ ایف بی آئی کے حکم نمبر پر دہکتی ہے۔

4۔ یہ کہ سب سے پہلے ایف بی آئی کے حکم نمبر پر مبنی جوئے الزامات کے بارے  
میں ایف بی آئی کے حکیمانہ ایس ایس ایف سے شروع ہو کر آخر کار سب سے پہلے سوال اردو  
معمولہ ایف بی آئی کے حکم نمبر پر دہکتی ہے۔

”Discharge“ کی۔

یہ کہ سب سے پہلے ایف بی آئی کے حکم نمبر پر مبنی جوئے الزامات کے بارے  
میں ایف بی آئی کے حکیمانہ ایس ایس ایف سے شروع ہو کر آخر کار سب سے پہلے سوال اردو  
معمولہ ایف بی آئی کے حکم نمبر پر دہکتی ہے۔

اس کے جواب میں ایف بی آئی کے حکم نمبر پر مبنی جوئے الزامات کے بارے  
میں ایف بی آئی کے حکیمانہ ایس ایس ایف سے شروع ہو کر آخر کار سب سے پہلے سوال اردو  
معمولہ ایف بی آئی کے حکم نمبر پر دہکتی ہے۔

ATTSTED



1017

**OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR**


**ORDER.**

This order will dispose of the departmental appeal preferred by Ex-Constable Zafran Ullah No. 4542 who was awarded the major punishment of "Dismissal from Service" under PR-1975 by SSP/Ops: Peshawar vide order No.2933-38/PA, dated 07.12.2021.

2- Short facts leading to the instant appeal are that the appellant while posted at DSB/CCP, Peshawar was proceeded against departmentally on the charges that he was hand in gloves with organized criminals and drug peddlers, Similarly, he was reportedly patronizing his illegal activities with the intention for personal gain.

3- He was issued proper Charge Sheet and Summary of Allegations by SSP/Ops: Peshawar. SP/Cantt: 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 he was recommended for major punishment. 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 also found unsatisfactory, hence was awarded the above major punishment.

4- 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 categorically denied the allegations but no solid evidence or proof was produced to prove his innocence. Therefore, his appeal for setting aside the punishment awarded to him by SSP/Ops: Peshawar vide order No. 2933-38/PA, dated 07.12.2021 is hereby rejected/filed.

  
(MUHAMMAD IJAZ KHAN) PSP  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

No. 968-75 /PA, dated Peshawar the 25 / 103 /2022

Copies for information and necessary action to the:-

1. SSP/Operations, Peshawar.
2. SP/HQrs: Peshawar.
3. AD-IT CCP Peshawar.
4. PO. CRC and OASI.
5. FMC along with complete fouji missal.

  
**ATTSTEL**

مخبرت جناب انسپکٹر جنرل افیو ایس گلبرگ سے درخواست ہے کہ وہ بتاویں

J (18)

مقبول رہیں۔ ریپورٹیشن بر خلاف آرڈر عدالتی 968-75/PA تو فرم 25/03  
2022  
جسکی برآمد پر سائل محمد علی احمد اسسٹنٹ "Reject" کیا گیا ہے۔

جناب عالی! خود نام گزار میں 319 سوال حسب الحکم انڈین ایئر لائن DSB بتاویں  
من تصنیفات تھا۔ دوران تصنیفات 319 سوال کے خلاف ایک خود ساختہ  
ڈراما ریکارڈ سائل کو ریپورٹ کی بنا پر بحوالہ مقدمہ عد 319 فرم 09/09  
2021  
420  
فرم 109/419/468/471 AA/3 KPK/13 D/9 خانہ بھرود

مازند کر کے حسین مخدوم عدالت کے بحوالہ منقطع مجاہد فرم 08/03  
2022  
عدم ثبوت کی بنا پر بے گناہ بنا کر بری کر دیا گیا۔ نقل منقطع ہماری طرف سے  
یہ سائل کے خلاف محمد علی احمد کو سائل محمد حسین کے خلاف کوئی  
ثبوت برآمد ہو کر بے طاقتور پر سائل کو ملدروقت سے برخاستہ کیا گیا  
حسن خلاف محمد علی احمد دائر کر کے حسین سائل کے جائزہ معروضات اور  
دلائل کو حال میں نہ لاکر سائل اس میں منسوخ کر دیا گیا

چونکہ سائل نے گناہ کیا اور کوئی جرم ثابت نہ کیا۔ اس لئے درخواست  
رہا سائل کو سائل نے گناہ کیا اور سابقہ صحافت شفاف رہا اور کوئی گناہ  
سائل کو ملدروقت پر دوبارہ بحال فرما کر مشکور فرمائیں۔ لاہور ہائی کورٹ  
ایجوٹا

ایک نامہ دار زعفران اللہ سابقہ سائل نمبر 4542-CCP بتاویں  
PC  
Contact no. 0333-9386408

28/08/2022

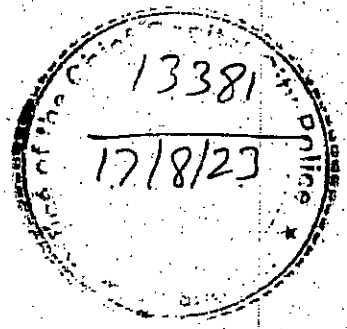
ATTST

درخواست دہی کے لئے درخواستی سے ملنے والی درخواست

مذکورہ درخواستی کے لئے درخواستی سے ملنے والی درخواست  
میں اس میں درخواستی سے ملنے والی درخواست  
میں اس میں درخواستی سے ملنے والی درخواست  
میں اس میں درخواستی سے ملنے والی درخواست

ان کے ساتھ ساتھ درخواستی سے ملنے والی درخواست  
میں اس میں درخواستی سے ملنے والی درخواست  
میں اس میں درخواستی سے ملنے والی درخواست  
میں اس میں درخواستی سے ملنے والی درخواست

16-8-2023  
سید علی محمد  
4542



ATTSTEL



FORM "A"  
FORM OF ORDER SHEET

Court of Dr. Qazi Ataullah ASJ-I, Khyber.

M (2)

Case No .....

Serial No. of Order or Proceedings	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary
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Order...06.  
04.01.2021

Accused on bail Zafran Ullah and Najeeb Ullah present. Their learned counsel Zafeer Gul Advocate present. Mrs. Shabina Maqsood Dy. P.P present. Arguments on the application of accused Zafran Ullah, regarding his discharge, heard.

Accused Zafran Ullah was arrayed in this case on the basis of statement of the co-accused Najeeb Ullah u/s 163 Cr.P.C. Najeeb Ullah has stated that Zafran used to facilitate him in the business of contraband. For this accusation, no corroborative material is available on the file. No CDR has been placed on the record. During police custody, no incriminating material (recovery, discovery and confession etc) has been gathered against accused Zafran. The learned Dy. P.P has also replied that, besides the statement of co-accused, no supporting material is available on the file, against the accused Zafran. For the reason that sufficient material for indictment is not available, therefore, the court discharges accused Zafran

Handwritten signature and date: 04.01.2022

Joint Magistrate & Sessions

ATTORNEY

Handwritten signature and official stamp of the court.

22

from the case, in the light of judgment of the august superior court (2021 MLD 1532).

Sufficient material for framing of charge upon accused Najeeb Ullah is available on the file. Formal Charge, therefore, framed upon him. Accused pleaded not guilty and claimed trial.

Notices be issued to the witnesses of prosecution.

Separate notice be issued for case property.

Case file come up for prosecution evidence on

08-03-2022

Dr. Qazi Ataullah,  
ASJ-I, Khyber  
District & Sessions

CERTIFIED TRUE COPY

*[Signature]*  
(Examined)  
Copying Rights Reserved  
Khyber

No	2033
Dated of Application	6/11/22
Name of Applicant	Dr. Qazi Ataullah
Word/Pages	2040 SP
Fee	Rs. 00
Signature of Clerk	<i>[Signature]</i>
Dated of Preparation	6/11/22
Date of Delivery	6/11/22

ATTORNEY



**VAKALAT NAMA**

NO. \_\_\_\_\_/2023

IN THE COURT OF KP Service Tribunal, Peshawar

Mian Zafsan Ullah

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Police Department

(Respondent)  
(Defendant)

I/We, Zafsan Ullah

Do hereby appoint and constitute **TAIMUR ALI KHAN, ADVOCATE HIGH COURT**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated \_\_\_\_\_/2023

Zafsan Ullah  
(CLIENT)

ACCEPTED

TAIMUR ALI KHAN  
Advocate High Court

BC-10-4240  
CNIC: 17101-7395544-5  
Cell No. 03339390916