BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

AMENDED SERVICE APPEAL NO.292/2023

Qaiser Abbas

VS

Police Deptt

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APPELI

THROUGH:

(TAIMUR ALI KHAN) ADVOCATE HIGH COURT Cell No.03339390916

<u>BEFORE THE KHYBER PAKHTUNKHWA ŚERVICE TRIBUNAL,</u> <u>PESHAWAR</u>

AMENDED SERVICE APPEAL NO.292/2023

Mr. Qaiser Abbas, Ex-Constable No. 602, Police Lines Hangu.

Khyber **F** Diamon Dated OR

(APPELLANT)

VERSUS

1. The Provincial Police officer, Khyber Pakhtunkhwa, Peshawar.

2. The Regional Police officer, Kohat Region, Kohat.

3. The District Police Officer, Hangu.

(RESPONDENTS)

AMENDED APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 21.07.2022, WHEREBY THE APPELLANT HAS BEEN REMOVED FROM THE SERVICE AND AGAINST THE ORDER DATED 14.09.2022, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED FOR NO GOOD GROUNDS AND AGAINST MEMO/ORDER DATED 26.05.2023, WHEREBY THE **REVISION OF THE APPELLANT WAS REJECTED FOR** NO GOOD GROUNDS DURING PENDENCY OF SERVICE APPEAL.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS AMENDED APPEAL, THE ORDER DATED 21.07.2022, 14.09.2022 AND 26.05.2023 MAY PLEASE BE SET ASIDE AND THE APPELLANT MAY KINDLY BE REINSTATED INTO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST 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 in the year 2012 and has performed his duty with devotion and honesty, whatsoever, assigned to him.
- 2. That the appellant was posted as Computer operator in DPO Office Hangu and while working on the same post, complaint was filed by the Manger LEAs Jazz to respondent No. 2 about the leakage of personal customer data (cell detail record) against the cell No.92300114047, 923200415683 and 923008441257, which was forwarded to respondent No.3 for inquiry. It is pertinent to mention here that cell No.92300114047 was related to the DPO Office Hangu while the other two cell numbers were related to SP Investigation Office. (Copy of complaint is attached as Annexure-A)
- 3. That on the basis of complaint inquiry was conducted against the appellant along with others officials by the DSP Investigation wing, however, no inquiry report was provided to the appellant, which may be requisite from the department.
- 4. That charge sheet along with statement of allegation were issued to the appellant which was replied by the appellant in which he denied the allegations and clearly mention in his reply that official ID of DPO Office Hangu was linked with the Mobile of the Muhammad Ilyas who was working as Computer Operator in the office of DPO Hangu before the appellant and he has no knowledge how to leaked the personal customer data (cell detail record) of above mentioned cell number. (Copies of charge sheet statement of allegations and reply to charge sheet are attached as Annexure-B&C)
- 5. That after issuance of charge sheet, inquiry was again conducted against the appellant in which no proper chance of defense was provide to the appellant as neither statements were recorded in the presence of the appellant nor gave him opportunity of cross examination, but despite that the appellant was held responsible by the inquiry officer. (Copy of inquiry report is attached as Annexure-D)
- 6. That final show cause notice was issued to the appellant which was replied by the appellant in which he again denied the allegations and clearly mentioned in his reply that his predecessor Muhammad Ilyas has knowledge about the password of the Computer and Muhammad Ilyas has changed the language of the password and he tried his best to change the password but in-vain and he also told about the password to his high ups and Ex-DPO Ikram Ullah also told to PA Wajahat Hussain that the official ID link is attached to the mobile of Muhammad Ilyas and directed him to change the password and clearly mentioned in his reply that he has no knowledge how to leaked the personal customer data (cell detail record) of above mentioned cell

No. and has no role in the leakage of the data. (Copies of show cause notice and reply to show cause notice are attached as Annexure-E&F)

- 7. That on the basis of above baseless allegation and without conducting regular inquiry to dig out the realty about the allegation, the appellant was removed from service on 21.07.2022 vide order dated 21.07.2021. (Copy of order dared 21.07.2022 is attached as Annexure-G)
- 8. That the appellant filed departmental on 10.08.2022 against the removal order dated 21.07.2022, which was rejected on 14.09.2022 for no good grounds. Then he filed revision under rule 11-A of Police Rules 1975 (amended in 2014) on 03.10.2022, which was not responded within the statutory period of ninety days. (Copies of departmental appeal, rejection order dated 14.09.2022 and revision are attached as annexure-H,1&J)
- 9. That after the statutory period of ninety days, the appellant filed service appeal in this Honorable Service Tribunal and during the pendency of service appeal of the appellant, his revision was rejected vide memo/order dated 26.05.2023, therefore the appellant filed application to allow him to amend his service appeal to impugn the rejection memo/order dated 26.05.2023 in his service appeal, which was allowed by this Honorable Tribunal on 21.06.2023. (Copies of memo/order dated 26.05.2023, application and order sheet dated 21.06.2023 are attached as Annexure-K,L&M)
- 10. That the appellant now to wants to submit his amended appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

GROUNDS:

- A) That the orders dated 21.07.2022, 14.09.2022 and 26.05.2023 are against the law, rules, 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 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 as such the impugned orders are liable to be set aside.
- C) That the appellant clearly mention in his reply to charge sheet and show cause notice that his predecessor Muhammad Ilyas has knowledge about the password of the Computer and Muhammad Ilyas has changed the language of the password and he tried his best to change the password but in-vain and he also told about the password to his high ups and Ex-DPO Ikram Ullah also told to PA Wajahat

Hussain that the official ID link is attached to the mobile of Muhammad Ilyas and directed him to change the password and clearly mentioned in his reply that he has no knowledge how to leaked the personal customer data (cell detail record) of above mentioned cell No. and has no role in the leakage of the data, but despite that the appellant was removed from service without conducting regular inquiry to dig out the realty about the allegations, which is against the norms of justice and fair play.

D) That Wajahat Hussain who was working as PA to DPO Hangu mentioned in his statement which was recorded during the inquiry proceeding conducted by DSP investigation that official Email was linked with the mobile of Muhammad Ilyas and he disconnected the official Email from the linked mobile numbers on the direction of DPO Ikram Ullah, which also endorsed the stance of the appellant. (Copy of statement of Wajahat Hussain is attached as Annexure-N)

E) That the appellant was also discriminated as other official namely LHC Muhammad Ilyas who was also dismissed from service on the same allegation was reinstated in service from the date of dismissal and his penalty was modified into minor punishment of censure vide order dated 08.12.2022 on his revision filed by him under 11-A of Police Rules 1975 (amended 2014), but same treatment was not extended to the appellant, which is clear violation of Article-25 of the Constitution of Pakistan. (Copy of order dated 08.12.2022 is attached as Annexure-O)

- F) That the opportunity of personal hearing and personal defense was not provided to the appellant, which is against the spirit of Article 10-A of the Constitution.
- G) That the appellant has been condemned unheard and has not been treated according to law and rules.
- H) That the appellant seeks permission of this Honorable Tribunal to advance others grounds and proofs at the time of hearing.

that on the acceptance of this amended appeal, the order dated 21.07.2022, 14.09.2022 and 26.05.2023 may please be set aside and the appellant may kindly be reinstated into service with all back and consequential benefits. any other remedy which this august tribunal deems fit and appropriate that may also be awarded in favour of appellant.

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Qaiser Ab

THROUGH:

(TAIMUR ALI KHAN) ADVOCATE HIGH COURT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

AMENDED SERVICE APPEAL NO.292/2023

Qaiser Abbas

VS

Police Department

AFFIDAVIT

I, Qaiser Abbas, Ex-Constable No. 602, Police Lines Hangu, (Appellant) do hereby affirm and declare that the contents of this amended service appeal are true and correct and nothing has been concealed from this Honorable Tribunal.

DEPONENT



Fo, Mr. Tahir Ayoub

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Subject

Leakage of Customer Data

Dear Sir,

I hope this letter will find you in best of health and spirit. Trust and professionalism has always been at the forefront of our relationship. We truly admire your efforts for helping us in maintaining customer confidence overpersonal data protection.

However recenty a few cases regarding leakage of personal customer data (Call detail record) against cell no 92300011400,923200415633 & 923008441257 was reported. Source for leakage of said information is an authorized account of your office, details are given at the Annexure A to this letter. Violation of trust is detrimental tothe interest of both organizations in the given national environment.

Your good self it asked to intervene in the matter and take strict action against violators. I am certain that such kind of events will not happen in future and our relationship of mutual trust will continue to exist.

Lalso assure you that our help for law enforcement agencies in maintaining the noble cause of peace and stability will continue with full commitment.

Best wishes and frayers for success in your current assignment.

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Yours's sincerely Munir Hussain

Dated: 04//04/2022

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Manager LEAs Jazz

www.jazz.com.pk





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OFFICE OF THE DISTRICT POLICE OFFICER, HANGU Tel No. 0925-623878 & Fax No. 0925-620135 Email: dpohangu8@gmail.com

CHARGE SHEET

MR. ASIF BAHADER, PSP, DISTRICT POLICE OFFICER, I, . HANGU, as competent authority under Khyber Pakhtunkhwa Police Rules (amendments 2014) 1975, am of the opinion that you Constable Qaisar Abbas No. 602 while posted at Police Lines, Hangu rendered yourself liable to be proceeded against, as you have omitted the following act/omissions within the meaning of Rule 3 of the Police Rules 1975:-

- A letter issued from Manger, LEAs Jazz, Islamabad received from the worthy Regional Police Officer Kohat Region, Kohat vide Endst: No. 925/C.Cell, dated 13.04.2022 that you, Constable Qaisar Abbas No. 602 the then posted as Computer Operator at PA Baranch in DPO office, Hangu have leaked personal customers data (Call detail record) against Cell No. 923000114047, 923200415683 and 923008441257 during your posting as per Diary No. 161/PAL, dated 21.04.2022.

Your above act shows your negligence, disinterest and amount to 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.

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

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

A statement of allegation is enclosed.

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DISTRICT POLICE OFFICER, HANGU

OFFICE OF THE DISTRICT POLICE OFFICER, HANGU

Tel No. 0925-623878 & Fax No. 0925-620135 Email: dpohangu8@gmail.com

DISCIPLINARY ACTION

I, <u>MR. ASIF BAHADER, PSP, DISTRICT POLICE</u> OFFICER, HANGU, as competent authority, am of the opinion that you, <u>Constable Qaisar Abbas No. 602</u> 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.

> A letter issued from Manger, LEAs Jazz, Islamabad received from the worthy Regional Police Officer Kohat Region, Kohat vide Endst: No. 925/C.Cell, dated 13.04.2022 that you, Constable Qaisar Abbas No. 602 the then posted as Computer Operator at PA Baranch in DPO office, Hangu have leaked personal customers data (Call detail record) against Cell No. 923000114047, 923200415683 and 923008441257 during your posting as per Diary No. 161/PAL, dated 21.04.2022.

Your above act shows your negligence, disinterest and amount to gross misconduct on your part.

2. For the purpose of scrutinizing the conduct of said accused with reference to the above allegations <u>For the above allegations</u> 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, %HANGU

49 /EC, dated 21 / 06 /2022. Copy of above to:-

ii.

No.

1.

.2.

fice Work 2021/GC/E

patiern /Charge Sheet

:- The Enquiry Officer for initiating proceedings against the accused under the provisions of Police Rule-1975.

The <u>Accused official:</u> with the directions to appear before the Enquiry Officer, on the date, time and place fixed by him, for the purpose of enquiry proceedings.



بيان آ زاں كنسليل سيد قيصر عباس نمبر 602 متعينہ يوليس لائن ، ہنگو $\underline{\mathcal{C}}(\theta)$ جناب عالى! بحوالدجارج شيث تمبري DPO مورنة 21.06.2022 مجارية جناب DPO صاحب مُنكو معرد طبي خدمت كر مناكل مورفته 14.09.2021 كو PA برايج، جناب DPO صاحب، منكو تحسينية كم بيوثر آيريز تعينات، دوانفاا در سائل ايك وسبلن فورس ال مونے کے ناطے، بدوران پوسٹنگ اپنی ڈیوٹی ایمانداری، راز داری ادراحسن طریقے سے سرانتجام دی ت ادرآ فسران بالا صا^حان کو کنتم کی شکام^ی کا موقع تہیں دیا ہے۔ جہاں تک CDR بینے کالعلق ب، سائل PA برارٹی بی بحسٹیت کم ورثر آپر مرتعیناتی ، کم پیوٹر CDR کے مرائل تم برات 923000114047 ، 923200415683 اور 923008441257 بوالدڈائری نمبر 161/PAL مورند 2022 . 21.04 شيخ ے لاعلم ہے چونکہ ID پاسورڈ سابقہ کمپیوٹر آپر مفرخدالیاس اور دیگر شاف کے علم میں تھا جبکہ کمپیوٹر کی آفیشل ID کالزک کمپیوٹر آپر مفرخد الیاس کے موبائل يت منسك تحار مورخ، 15.12.2021 كو يشير تشاينات PAصاحب في متذكره Password تبديل كيا قناء جهان متذكره CDR مورجه 2021.12 كونيخ دى كى تقى، چونكه ساكل كونا كرده ترم كى بإداش ميں بينسانے كى كوشش كى جارى بے تا كه ساكل كا كردار آ نسران بالا . صاحبان سے سامنے خراب ہوئیکے در حالنکہ سائل بے گمناہ ہے۔ سائل کی تعییناتی کے دوران ،موبائل CDR تب آ فسران بالاصاحبان کوشیج دی جامیں جب متعلقہ تھا نہ جات وغیرہ سے با قاعده طور ير FIRs/DDs ر : ر ميس موسول موتي -الہدابد ربعہ بیان آب صاحبان سے استدعاعا جزانداستد عاکی جاتی ہے کہ مندوبہ بالاحفائق کو بدنظر رکھتے ، دیتے ، سائل کو چارج شیف بغیر سمی مترید کاروازی کے داخل دفتر فرما کرمشکور فرما نیس ۔ سائل تازیست دُعا گوادرمنون رہے گا۔ 22-06-2022_:19 Attested on bette 5. 6200 Lide 30-6-2022 ada il 1951 il 18 3 (19) last ورود و شر مادا ج ويولس لامن وتلى En Chies ve BI. PA MPALLES ふび rolo by place PB ATTSTED

ابسا الحادج وودم ور في ا DPOSPA IHE UN Diviso - Tos فالع ه الحادج حا . I was the start and Und Ship and Sms. OPPice 13 100 0 to the s 14 5 214 200 000 Z PA with the the the solution 1 F 2 12 Juli Shu jin had the spith alt. white and wind by the Je true 5 hours in the work of the D.Sp U.B SP Le is at Miler Will and and and go The with the start in the start with when 2, 0, ms 24 2022 ATTSTAT

<u>انگوائری از ال لنشیحل قیسر عماس نمبر 602 متعینہ پولیس لائن شلح ہنگو</u> بحواله جارج شيث نمبري \49/E مورجه 21.06.2022 دفتر جناب DPO صاحب منكو ،انكوائزي از ال كنسليل تيصر عماس نمبر 602 متعينه يوليس ہنگومعروض خدمت ہوں کہ جامن شیٹ ہزامیں ندکورہ تسٹیل پرذیل الزام لگایا گیا ہے۔ الرّام:_ نيجرجاز نيۇرك/ تمپنى اسلام آباد، جناب ريجنل چيف كوماٹ ڈويژن كوماٹ انڈرسنٹ نمبر 925/CCell مورجہ 13.04.2022 كم آپ^{كنس}يل ^ييسر عباس نمبر 20 6 صابقه کمپیوٹر آپریٹر PA برائج دفتر جناب DPO صاحب ہنگو اینے دوران تعیناتی جار کمپنی ک پرانٹردیک سٹرز نمبرات 923000114047,923200415683,923008441257 كى كال دْينامجوالد دْائرى نمبر 161/PAL مودخد 21.04.2022 كي ك انکوائیری راسس:۔ اس الملط مي كنسيل تصرعباس نبر 602 كودفتر بذاطلب كر يح جس في ابناتحريرى بيان بيش كما جولف بذات -كتسفيل قيصرعباس نمبر 602:-ن بیان کیا که ده مورد 14.09.2021 کو PA برایخ جناب DPO صاحب منگونین تحسشیت کمپیوٹر آ بریزلغینات مواتفا بحسبتیت ایک ڈسپلن نورس میں ہونے کے ناطے بدوران پوسٹنگ اپن ڈیوٹی ایمانداری، راز داری اوراحسن طریقے ہے سرانجام دی ہے۔ کبھی بھی انسران بالاصاحبان کوشکا یت کا مو^{تع نہ}یں دیا ہے۔ جان تک CDR میج کا تعلق ب ده PA برایخ می بحسیت کمپیدر آپریز تعیناتی DR باب موائل نمبرات 923000114047,923200415683,923008441257 بوالد دانيرى نمبر 161/PAL مودخه 2022.04 قيصيخ - بالكل لالم ے - چونکہ OIIدر پا سورڈ سابقہ کمبد وٹر آپر ینرخد الیاس اور دیگر سناف بے علم میں بھی تھا - جب کمبد وٹرکی آفیش ID کالنک کمبوٹر آپر ینرئد الیاس سے موبائل ت مسلک تھا -مورجه 15.12.2021 کو بیج تعینات PA صاحب نے متذکرہ Password تبدیل کردیا تھا۔ جہاں منذکرہ CDR مورد. 01.12.2021 ک دی گئی تھی۔اسے ناکردہ گناہ میں پینسانے کی کوشش کی جارہی ہے۔تا کہ اس کا کردار آنسران بالاصاحبان کے سامنے جراب ہو۔اس نے ای تعیناتی کے ددران مو بائل CDR تب بن الرئيسيج ب متعلقه مناندجات وغيره ، با قاعده طور بر FIRs/DDs ر بورغين موصول موتين . امل يقائق جناب داله! لُكائ مح الزامات مي تفصيلا ابتدائي الكوائيري فرين سيرنند نت آف يوليس انو في كيسن ونك كري بي -دوران الكوانيري جناب فري سپرنٹنڈنٹ آف پولیس انوسی کیشن نے CFU برانچ اندش کیشن ونگ کے کمپیوٹر آپریٹر LHC خورشیدنواز نمبر 313 ، تمام دنتری سناف PA ٹو DPO سا دے بشول PA ثو DPO دجابهت حسين IHC بمحدالياس نمبر FC، LHC/09 عبدالرؤف نمبر FC،613 قيصر عباس نمبر 603 كوبسلسله انكوائيري تحريري بيانات قلم بندكر يتيك یں یہ تمام لئے گئے بیانات کو درست تصدیق کر کے انگوانٹیر کی ہٰذا کا بھی حصہ قرار دیا جاتا ہے۔ جناب DSP صاحب انوش کیشن دنگ کے انحوا تیری فائنڈنگ کے ردشن میں تصور دارکسٹیبل قیصر عباس کو جناب DPO ساحب استاد کے جانب سے جا رن شین بذاجاری ہو کرفشوردار کنشیل کودفتر بداطلب کرے جس سے لگائے کے الزامات سے سلسلے میں تحریری بیان بھی لیا گیا۔ قسوردار کنشینل اپنے بیان میں لگائے گئے الزامات كى تختى _ رويدك _ تفسيلا بيان الف قابل ملاحظ ب-تصور دارنسٹیل کے بیان میں صداقت معلوم کرنے کی خاطراس پہ کراس سوالات بھی کئے گئے ۔ دوران کراس ندکورہ کنسٹیل نے خود کو کمپیوٹر خواندہ ^قراردیا۔ ^جاب سابقدا كوائيرى آفيسركود دران بيان اس ف آين آب كوكم يدثر ، مادا قف تسليم كر يكيد يدثرياس در أديجر سلاف يحمل مي مددا بهى ظابر كما تحا-7 ATTSICO

کر) مواہم - جبکہ 0300-0114047 کاڈیٹا جناب DPO صاحب کے لنک / ایڈریس پر تکالا کیا ہے۔ جو کہ CDR ڈیٹا مورخہ 01.12.2021 کو جوارز ب اس دفت کسٹیمل قیصر عماس ہی کمپیوٹر آپریٹر تعیان تقا۔ اور سابقہ کمپیوٹر آپریٹر الیاس کا جادلہ ماہ تمبر میں ہوچکا تقا۔

قصوردار کمسٹیمل نے دوران انکوائیری ظاہر کیا کہ جب وہ کمپیوٹر آپریٹر تعینات ہوا تو کمپیوٹر کی ایکس ان ڈی کا لنک سابقہ کمیوٹر آپریٹر تھر الباس مے موہ اکل نون ۔ مسلک تھا۔ جو کہ اس کواپنے تعیناتی لیتی مورجہ 14.09.2021 کے بعد نوری طور پرتبدیل کرنا ضروری تھا۔ جو کہ تصوروارکت 01.12.2021 کوجاری شدہ CDR سے عمل غافل پایا گیا۔ جو کہ گراس مس کنڈ کٹ کے زمرے یہں آتا ہے۔

مالقدانکوائیری میں لئے کیے بیانات اور من انکوائیری آفیسر کوتصوروار کسٹیم کی قیصر عباس سے دیتے گئے بیان و کراس ،لف شدہ تمام ریکارڈ پڑتال کا بغور جائزہ لینے سے بعد من انکوائیری آفیسرای نیتج پر پہنچا ہوں کہ تصوروار کسٹیم کی قیصر عباس جو کہ ایک حساس سیٹ اور حساس ڈیو ٹی پر تعینات تھا۔اور دوران تعیناتی انتہا کی غیر ذمہ داری اور گراس میں کنڈ کٹ (Gross Misconduct) کا مرتکب ہوا ہے۔لہذا اسکے خلاف لگائے کے الزامات درست پائے جاکرتسور دارکسٹیول قدر عبار کے معارف میں کنڈ کٹ (Major Punishment) کا مرتکب ہوا ہے۔لہذا اسکے خلاف لگائے کے الزامات درست پائے جاکرتسور دارکسٹیول قدر عبار کر

ب ليويش يوليس افسر منكو مرابع عرص مرابع مرابع مراجع



ii.

HANGU Tel: 0925-623878 Fax 0925-620135

OFFICE OF THE DISTRICT POLICE OFFICER

/EC dated Hangu the 7 / 7 /2022

FINAL SHOW CAUSE NOTICE

1. I, <u>Asif Bahader, (PSP), District Police Officer, Hangu</u> as competent authority, under the Khyber Pakhtunkhwa Police Rules 1975, (amended 2014) is hereby serve you, <u>Constable Qaisar Abbas No. 602 while</u> posted at Police Lines, Hangu as fallow:-

i. The consequent upon the completion of inquiry conducted against you by the inquiry officer in which you have given full opportunity of hearing, but you failed to submit any reasonable response in your self defence and recommended you for awarding a major punishment vide his office finding No. 1013/SDPO, dated 30.06.2022.

From going, through the finding and recommendations of the inquiry officer, the material on record and other documentary proof including your defense before the inquiry officer.

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

A letter issued from Manger, LEAs Jazz, Islamabad received from the wor hy Regional Police Officer Kohat Region, Kohat vide Endst: No. 925/C.Cell, dated 13.04.2022 that you, Constable Qaisar Abbas No. 602 the then posted as Computer Operator at PA Baranch in DPO office, Hangu have leaked personal customers data (Call detail record) against Cell No. 923000114047, 923200415683 and 923008441257 during your posting as per Diary No. 161/PAL, dated 21.04.2022.

Your above act shows your negligence, disinterest and amount to gross misconduct on your part.

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

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.
The copy of the finding of inquiry officer is englosed.

対抗の DISTRICT POLICE OFFICER, HANGU



جناب عالى!

بحواله فائل شوکاز نمبری 125/EC مورخته 202.07.07 مجاربی جناب DPO صاحت مورخه 14.09.2021 کو PA برایخ جناب DPO صاحب منگویین بخت بیته کمپیوژ آپریثر تعینات ہوا تھی مردش خدمت ہوں کہ سائل ہونے کے ناطے بددران پوسٹنگ اپنی ڈیوٹی ایما نداری ،راز داری ادراحسن طریقے سے سرانجام دی ہے۔ اس سے پیزیکن نورس میں صاحبان کو کم تسم کی شکایت کا موقع نہیں دیاہے۔

جہاں تک CDR نیصبخ کا تعلق ہے۔سائل PA برائج میں تحسینیت کمپیوٹرا پر یز تعییناتی کے دوران افیشل D-I کے CDRs بر کاردائی۔ لاعلم تھا۔ سائل کی تعیناتی سے پہلے تعینات کمپیوٹر آپریٹر عبدالرؤف متعینہ PA برائج اور موجودہ سناف کے ساتھ ساتھ سابقہ کمپیوٹر آپریٹر محمدالیا س نمبر 09 کے علم میں بھی پاسورڈ تھا۔سابقہ کمپیوٹر آپریٹر محمدالیا س نے پاسورڈ کی لینکو بنج (زبان) انگلش سے جائنیز (CHINA) میں تبدیل کی تھی جس کی دجہ سے من سائل نے پاسورڈ تبدیل کرنے کی کافی کوششیں کی مگرنا کا م رہا۔اورموجودہ ساف سے بھی مدد لی مگرنا کا م رہے۔اس کے باوجودہ وچودہ پال آفس انچارج محد اساعیل نمبر 142 ہے بھی پاسور ڈچینج کرنے کے متعلق کہالیکن اس ہے جسمی پاسور ڈک تبریلی میں کامیابی حاصل نہ ہو تکی۔

جب نوتعینات موجود ه PA صاحب د جاہت حسین دفتر حاضرآیا تو چند دن بعد PA صاحب کے نوٹس میں پاسور ڈکی بات لا کی گئی۔ سابقہ DPO اکرام اللّدصا حب نے بھی موجودہ PA صاحب کو تھم دیا کہ آفیشل I-D کالنگ محد الیاس کے موبائل سے اٹیچڈ ہے لہذا پا سور ڈ چینے کرے۔اس کے بعد من سائل کو بینہ چلا کہ افیش D-l کالنک سابقہ کمپیوٹر آپریٹر محد الیاس کے موبائل سے ایٹ چیڈ ہے۔

موجودهPAصاحب في الفيش ID كاياسورد مورخه 15.12.2021 كوبمشكل تبديل كيا-جوكه سابقه كم يوثراً پريتر خد الياس ف ہیک کیا تھا۔ یہ بھی معلوم ہوا کہ سابقہ کمپیوٹر آپریٹر تھہ الیا س CDRs میں کانی دلچ ہی لیتا تھا۔

من سائل تےCDR نبرز:23000114047,923200415683,923008441257 مودخه 01.12.2021 بحدالد دائيرى نمبر 161/PAL مورجه 21.04.2022 كي يحيج من بالكل انجان ب من سائل كاافسران بالا صاحبان کے سامنے ادر محکے میں کردار خراب کرنے کی کوشش کی جارہی ہے۔ سائل کوا یک ناکردہ جرم میں بے گناہ گلی کیا جار ہاہے۔

آفسران بالاصاحبان کے عاجزانہا ہیل ہے کہ سائل کے ضعیف العمر والدین اور چھوٹے چھوٹے بچوں کے ستقبل کوتار یک ہونے سے بچایا جائے کیونکہ سائل اس نوکری کے علاوہ آیدن کا کوئی ذریعین ہے۔ سائل کا افسران بالا صاحبان سے عاجز انہ / در دسندا نہ اچل ہے که سائل کواس انکوائیری میں نا کردہ گناہ ہے مبرافر ما کر شکورفر ما تیں۔ سائل افسران بالاصاحبان ^{کے د}ق میں ناحیات دعا گو، شکور دمنون رہےگا۔علادہ ازیں سائل اپنے بے گنا ہی کے متعلق ہوشم کے قتم اٹھانے کو نتارہے۔میرایہ بیان خدا کو حاضر دناظر جان کر بالکل حقیقت پر پنی

5. Quints

19:07.2022:*1*7





ii.

HANGU

Tels 0925-623878 Fax 0925-620135

<u>DRDER</u>

This order is passed on the departmental enquiry against Constable Qaisar Abbas No. 602 while posted at Police Lines, Hangu under the Knyber Pakhtunkhwa Police Rules 1975 (Amendment 2014).

Brief facts of the case are as under:-

A letter issued from Mangor, LEAS Jazz, Islamabad received from the worthy Regional Police Officer Kohat Region, Kohat vide Endst: No. 925/C.Cell, lated 13.04.2022 that Constable Qaisar Abbas No. 602 the then posted as Computer Operator at PA Baranch in DPO office, Hangu has leaked personal sustomers data (Call detail record) against Cell No. 923000114047, 923200415683 and 923008441257 during his posting as per Diary No. 61/PAL, dated 21.04.2022.

His above act shows his negligence, disinterest and amount to gross misconduct on his part.

Ie was served with Charge Sheet and statements of allegations vide this office No. 49/EC, dated 21.06.2022, to which he submitted his reply to the DSP City, Hangir who was appointed as Enquiry Officer to conduct departmental enquiry against him. After completion of enquiry, the Enquiry Officer submitted finding report vide his office No. 1013/SDPO, dated 30.06.2018 in which the defaulter Constable Qaisar Abbas No. 602 was summoned for ascertaining the actual facts so as to proceed further into the matter. He was heard in person by providing full cross examination opportunity in his self defence. In due course of enquiry, no reasonable response could be given by the aid Constable in his self defence thus, held him guilty for the charges leveled against him therefore, the enquiry officer recommended him for awarding a major punishment.

Consequently, he was called in orderly room on 20.07.2022 and heard in person, but he failed to submit any plausible cepty in his self defence.

Subsequently, Final Show Cause Notice was issued to him vide No. 125/EC, dated 07.07.2022 to which he submitted his reply on 19.07.2022 and found unsatisfactory as well.

Keeping in view of above and having gone through available record, the undersigned has arrived at the conclusion that defaulter Constable Qaisar Abbas No. 602 is committed gross misconduct, irregularities, irresponsibility and non-professionalism, which indicates that he was not interested to serve further. Moreover, in these circumstances his retention in Police Department is burden on public exchequer, therefore, I, Asif Bahader, (PSP), District Police Officer, Hangu in exercise of the powers conferred upon me under the Rules ibid, dispense with general proceedings and awarded him a major punishment of Removal from Service with immediate effect.

Order Announced. OB No. <u>34</u> /2022Dated 111/

DISTRICT HOLICE OFFICER HANGU

OFFICE OF THE DISTRICT POLICE OFFICER, HANGU.

No. 4183-65 /EC, dated Hangu, the $21^{\circ}/67/2022$ Copy of above is submitted to the Regional Police Officer, Kohat Region, Kohat w/r to his office Endst: No. quoted above for favour of information, please. 2. Pay Officer, EC, Reader & OASI for necessary action.

> DISTRICT POLICE OFFICER, HANGU

ايتل برخاستلى فيصله آر ڈريک ممر کى 247 مور خد 21/07/2022 (All) مجاريه جناب دستركت پوليس آفيسر منكو جاتياليا سائل ذیل عرض رسال ہے استداني. 1۔ سائل تحکمہ پولیس میں کنسٹیل 2012میں بھرتی ہو کر احسن طریقے سے ڈیوٹی سر انجام دے کر مندر جه عنوان بالاحكم مح تحت ڈیوٹی سے فارغ كردیا كما۔ (آر ڈرہمر اہلف ہے) 2۔ یہ کہ سائل کی اپیل میعاد کے اندر ہے۔ 3۔ یہ سے سائل کو بغیر شوائی کے ضلعی پولیس آفسر نے محکمہ سے فارغ کیا۔ 4۔ یہ کہ سائل کی انکوائیر کی میں کافی امور ہے جو کہ انکوائیر کی افسر ان نے واضح نہیں کئیے اور فطر (لی انصاف کے اصولوں کے منافی ہے۔ وأقعاني عدرات 1۔ یہ کہ سائل کو CDR لیک کرنے کے الزام میں قصور وارٹھر ایا تمیاجکہ اپنے بیان تفیصلی مہی تمام الزر کی وضاحت ردى تخري ب- جسكو خاطر خواد مين نهين لايا حيا- (بيان لف قابل ملاحظه B-) 2- بيه كمدا مكوائيري آفيسر في بيان من سائل كوبهي خاطر خواه بنه لايا اورابية مريورث ميں تجھيم كمديو شريب الحالات تجرير كرا اور ساتھ بی LHC الیاس بھی تح یاس DPO صاحب کی آفیشل ID کاپا سور ڈتھا اس کا بیان آینا بھی کو زراند کیا ادرجرف محجصے مورود الزام تھر اکر قصور دار بنادیا۔ د- یہ کہ سائل کی انگوائیری کی دوران HCاوجامت سے بیان کے مطابق کھی آفیشل Email تخدد الیا سے طوبائل ____ لنك كر نابيان كيا- (بيان لف انكوائير ك C قابل ملاحظه ب-) 4- به كداس الكوائيرى مين FIA سائير كرائم كوفصيلى الكوائيرى كى خاطرياد ساطت افسر ان بالاتحرير كياجاتا نوسب کچھ حقیقت سامنے آجاتااور قصور وار کا تعین تھی شوت کے ہم اہ ہوجاتا۔ 5- بیہ کہ چھٹی مذکور ہمیں بھی نمبر جسکی CDR منگوائی گئی تھی موجود ہے۔مگر کمپیوٹر میں نہ پکار ڈیندم موجود تھا۔ کیچ نک بيه CDR نمبر LHC محمد الياس جسك بإس D ابمعه بإسور فرموجو دتها - اس في محيوا بإسما- (يحمق لف قابل ملاحظه C لہذااستد عاب کہ سائل کے حال پر اور سائل کے بچوں اور ضعیف العمر والدین پر رہم قرسا کر سائل کی اپیل کومنظور فر مایا جا کرسر وس پر بحالی کے احکامات صادر فر مائیں جائیں۔ ماتحت پردری ہوگی۔ 10 08 2022 5. Quis بل سيدقيفر عباس سابقه تمر 602 ATTSTED

ORDER.

This order will dispose of a departmental appeal, moved by the Ex-Constable Qaiser Abbas 602 of district Hangu against the punishment order, passed by DPO Hangu vide OB No. 247, dated 21.07.2022 whereby he was awarded major punishment of removal from service on the allegations of leaking CDR (Call Data Record) of a person for his personal gain.

He preferred appeal to the undersigned, upon which comments were obtained from DPO Hangu and his service record was perused. He was also heard in person in Orderly Room held in this office on 13.09.2022. During hearing the appellant did not advance any plausible explanation in his defense to prove his innocence.

I have gone through the available record which indicates that the allegations leveled against the appellant have been proved and the same have also been established by the E.O in his findings. Moreover, posting in CDR Branch and authorizing a specific password to the official is done with a mutual trust between the authority concerned and Police official. The appellant not only misused his authority but also breached the trust of his seniors. Therefore, in exercise of the powers conferred upon the undersigned, his appeal being devoid of merits is hereby rejected.

Order Announced 13.09.2022

(TAHIR AYUB KHAN) PSP

Region Police Officer, / Kohat Region.

NUMAL REGIUN V

No. / 3 4/2 /EC.

5

dated Kohat the

Copy to District Police Officer, Hangu for information and necessary action w/r to his office Letter No. 4898/LB, dated 02.9.2022. His Service Record is returned herewith.

(TAHIR AYUB KHAN) PSP Region Police Officer,

ATTSTED

السبك المعاد جناب انسبكتر جمزل آف بوليس صوبه نيبير پختون خواه پنتا در 🗸 🖉 🖉 ابيل برخائتگى فيصله آر ڈربک نمبرى 247 مورخه 27/2022 تا 25/27 مجاربيد جناب ڈسٹر كت پوليس آفيسر منگو

جناب عالي! سائل عرض دسال سبته 1_سائل محكمه بوليس مي كنسليل 2012 بمرتى موكراحسن طريق ، ديول مرانجام د يكرمندرجة عنوان بالاعلم كتحت ديونى -فارغ كرديا كيا- (آردر مراه لف ٨ ب) 2- بیک سائل کی ایل میعاد کے اندر ہے۔ 3 - بيرك سائل كوبغير شنوائي كصلعي يوليس آفيسر في محكمه سي فارغ كيا -4۔ بیر کہ سیائل کی انگوائیری میں کافی امور ہے جو کہ انگوائیری آفسر ان نے واض نہیں کئے اور فطرتی انصاف کے اصولوں کے بلکل منافی 5۔ بیر کہ اپیل برخانتگی تقلم DPO ہنگو کے DIG کو ہاٹ کودائر کی گئی خی ۔ جنہوں نے اپیل کو خارج کردیا۔ (آرڈر خارجی ہمراہ لف (-<u>واقعاتی عذرات _</u> 1 - بیر که سائل کو CDR لیک کرنے پر قصور دار ترایا گیا، جبکہ اپنے بیان تفسیل پس تمام امور کی دختا حت کردی گئی ہے جسکو خاطر خواہ میں شيس لايا كميا- (بيان لف قابل ملاحظه B-) 2- بیر که انگونزی آفیسر فی بیان من سائل کوبھی خاطر خواہ نہ لایا ادرائی رپورٹ میں بھی مجھے انجان تحریر کیا، اور ساتھ ہی EHC الیاس جس کے پاس DPO صاحب کی آفیش ID کا پاسور ڈخواس کا بیان ^ا بنائھی گواراہ نہ کیا اور صرف بچھے مورود الزام تفرا کر قصور دار بنادیا۔ 3- بیرکد سائل کی انکوائری کے دوران IHC وجامت کے بیان سے مرابق جنی آفیشل Email محد الیاس سے موبائل سے لنگ کرنا بیان کیا۔ (بیان لف انگوائری قابل ملاحظہ C ہے) 4۔ بیرکهاس انگوانزی میں FIA سائبر کرائم کوضیلی انگوانزی کی خاطر بازساطین انسران بالاتحریر کیا جاتا توسب پچھ حقیقت ساسف آجاتا اور قصور دار کانعین بھی تہوت کے ہمراہ ہوجاتا۔



5۔ یہ کہ پھٹی کر ور کے علاوہ دونمبرات جو CFU سنگو کے Email سے بھیجوائی گئ ہے، جو چھٹی لف کے CDR میں موجود تبین ہے ادرایک نمبر جوچھٹی میں موجود ہے، مگر کمپیوٹر میں ریکارڈ عدم موجود تھا۔ کیونکہ پینمبر LHO محمد الیاس جسکے پاس ID کا پاسورڈ بمعید موجود قا، اس في جوايا تقا، (جم في اف قابل ملاحظه 0 -) لہد ااستد عاہے کہ سائل کے حال پراور سائل کے بچوں اور ضعیف العمر والدین پر دحم فر ما کر سائل کی اپیل کو منظور فرمایا جا کرسروس پر بیحالی احکامات صا درفر ما تیس جا تیں۔ 5. Airs 10 03 2022 ماتحت پروری ہوگی e de la companya de l La companya de la comp سابقة كالشيبل سيد فيعرعواس فببر 602 $D \cdot D = 10543/5B$ and the second i Englischer Hargerier V date $z o_3 \frac{10}{2022}$ ATTSTED

141 (Z 123, dated Peshawar the 2 61 25 121128.

OFFICE OF THE INSPECTOR GENERAL OF POLICE KHYBER PAKHTUNKHWA Contral Police Office, Perhawar.

The Regioner Policy Officer. Kohat

REVISION PLTITION.

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រនៅផង

¥ъ

Ples refer to your office Memo No. 5380/EC, dated 12.05.2023

The Competent Automaty has examined and filed the revision polition (ghodied by fix-FC-Other Abus N3.602 against the punishment of dismissal from service x untif by DRO thought vide Oft No. 247, dated 21.07.2022 as his service appual is sub-

His Storice found & Fight Mezal received vide your office Mann. No. 1+11+ ht. d and 15 11 2022 is returned herewith for your office record, please.

It spplicart may plea a be informed accordingly

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EXPSARIAN) Rational Fischericanity and Chib Palmatawal

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OFFICE OF THE INSPECTOR GENERAL OF POLICE KHYBER PAKHTUNKHWA Central Police Office, Peshawar.

No.S/1418/23

dated Peshawar the 26/25/2023

The Regional Police Officer, Kohat.

Subject: <u>**REVISION PETITION**</u>

Memo

Τó

The competent has examir ed and filed the revision petition submitted by Ex-FC Qaiser A No.602 against the punishment of dismissal from service awarded by DPO Hangu vide OB No.247, dated 21.07.2022 as his service appeal is sub-judicein the Service Tribunal Khyl er Pakhtunkhwa.

Please refer to your office Memo No.5380/EC, dated 12.05.2023

His Service record &Fauji Missal received vide your office, Memo No. 16555/EC, dated 18.11.2022 is returned herewith for your office record, please. The applicant may please be informed accordingly.

Encls: Service + Fauji Missal.

(AFSAR JAN) Registrar For Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

ATTSTE

L (2)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 292 /2023

Qaiser Abbas

V/S

Police Department

APPLICATION FOR PERMISSION TO ALLOW THE APPELLANT TO AMEND THE INSTANT APPEAL DUE THE PASSING OF THE REJECTION OF REVISION ORDER DATED 26.05.2023 DURING THE PENDENCY OF INSTANT APPEAL.

RESPECTFULLY SHEWETH:

- 1. That the appellant has filed the instant appeal in this Honorable Tr bunal against the order dated 21.07.2022, whereby the appellant was removed from service and against the order dated 14.09.2022, whereby the departmental appeal of the appellant was rejected and against not taking action on the revision of the appellant within the statutory period of 90-days
- 2. That after lapse of statutory period of ninety days, the appellant filed the instant appeal in this Honorable Tribunal and during the pendency of service appeal of the appellant the revision of the appellant was filed/rejected on 26.05.2023. (Copy of order dated 26.05.2023 is attached as Annexure-R-1)
- 3. That as the revision of the appellant was filed/rejected on 26.05.2023 during the pendency of the instant appeal in this Honorable Tribunal, which also necessary to be challenged in the instant service, therefore, the appellant wants to amend the instant appeal by impugning the rejection order dated 26.05.2023 in the instant appeal.





It is therefore most humbly prayed that on the acceptance of this application, the appellant may kindly be allowed to amend the instant appeal by impugning the rejection order dated 26.05.2023 in the instant appeal before this Honorable Tribunal.

THROUGH:

TAIMUR ALI KHAN ADVOCATE HIGH COURT

APPELLANI

AFFIDAVIT

It is affirmed and declared that the contents of this application are true and correct to the best of my knowledge and belief.

DEPONENT

ATTSTED

Raisar Abbas & Gant

21.06.2023

S.A No. 292/2023



Learned counsel for the appellant present. Mr. Fazal Shah Mohmand, Additional Advocate General for the respondents present.

Learned counsel for the appellant contended that during the pendency of the instant appeal, review petition filed by the appellant before the Inspector General of Police was filed/rejected on 26.05.2023, therefore, he wants to challenge the same. In this respect, he also submitted an application, which is placed on file. The amendment in the appeal so sought by the appellant would not change the nature of the appeal. Keeping in view the interest of justice, the application is allowed. To come up for submission of amended appeal on 02.08.2023 before the D.B. Parcha Peshi given to the parties.

Naeem Amin

(Salah-Ud-Din) Member (J)

to be ture copy Certifier vice Tribunal Pesbawar

Date of Presentation of Application Number of Wordspeed Copying Fee Urgent. Total. Naine of Confine Date of Complection Date of Delivery of Copy 3

بيان آزال HCاوجابت حسين متعينه PA TO DPO Hangu

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ATTST

جناب عالى!

معروض خدمت بول كمن IHC كانبادله بطور PA تو DPO صاحب منكومور خد 11.202 02. 12 كوبواب اورتا حال تعلنات مول به ریہ کہ بن IHC کی تعیناتی ہے پہلے کنٹ لیل سید قیصر عباس نمبر 602 بطور کم بیوٹر آپریٹر PA برائج تعینات تھا۔ بد كنسميل سيد قيصر عباس نمبر 602 سے پہلے كچھ دنوں كيلي كنسميل عبدالرؤف نمبر 613 بطور كمپيوٹر آپريٹر بمطابق ريكار ڈ OHC برائ تعینات تھاجس سے پہلے LHC محد الیاس بر 09 مورجہ 29.06.2021 تا 09.09.2021 تک تعینات ر ہااور DPO صاحب ہنگو کا آفیشل Email مزکورہ کے موبائل سے لنگ تھا۔ یہ کہ پڑتال ریکارڈ پرموبائل نمبر 0114147-0300 کے CDR کا کمی قشم کی خط و کتابت موجود نہیں ہے۔اور نہ ہی کم پیوٹر نذامیں کوئی ریکارڈ موجود ہے۔ فوٹو کا پی بابت ریکارڈ آفنیش Email لف بنراہے۔ یہاں پیچی واضح کرنا اہمیت کے حامل ہے کہ مورخہ 2021، 12، 2021 کوسابقہ DPO صاحب جناب اکرام اللہ کے ظلم پر الفيتل Email بي موبائل نمبرات لذك شده كوشتم ادريا سورد ، وبريكي يشرأ برييزسيد قيصر عباس 602 كم ن PA في سرانجام دیاہے۔اور بعداز المور بذائے متعلقہ کمپیوٹر وEmail کے ساتھ سی تسم کاغرض وتعلق نہیں رکھاہے۔ بہ میرا بیان ہے جوسرا سرحقیقت پر بنی ہے۔ 16.05.2022-17

-HCاوجامت حسين ^{نم}بر 112

PA TO DPO Hangu

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ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Knyber Pakhnukhwa Police Rule-1975 (amended 2014) submitted by Ex-LHC Mahammad Hyas Ns. 07. The petitioner was dismissed from service by District Police Officer, Hangu vide Off No. 318, dated 23.08.2022 on the allegations that he while posted to Police Post Torpul of Police Station Thall, but he deliberately not reported his arrival to his place of posting and disappeared without any permission from his aerdors. Hence, he committed a gross professional misconduct for non-compliance of lawful orders. In addition, it was noticed that he was found in leakage of secrecy of the department and exhibited himself as untrustworthy official. His appeal was rejected by Regional Police Officer, Kohat vide order Endst: No. 15183/EC; dated 20.10.2022.

Petitioner was called and heard in person on 02.12.2022. During hearing petitioner denied the allegations levelled against him.

The Board decided that the penalty imposed upon Ex-LHC Muhammad liyas No. 09 is hereby modified into minor punishment of Censure and he is re-instated in service from the date of dismissal as no evidence incriminating was present against him.

> Sd/-(SABIR AHMED) PSP Addl: Inspector General of Police, HQrs: Khyber Pakhtunkhwa, Peshowar.

No. 5/ 3020-26 122, dated Peshawar, the 08-12 12022.

Copy of the above is forwarded to the:

- 1. Regional Police Officer, Kohat.
- 2. District Police Officer, Hangu.
- 3. PSO to IGP/Khyber Pakhunkhwa, CPO Peshawar.
- 4. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
- 5. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
- 6. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
- 7. Office Supdi: E-IV CPO Peshawar.

(MUHAMSTADASIF) AIG/Legal For AIG/Establishment, Khyber Pakhtunkhwa, Peshawar.

VAKALAT NAMA

NO.____/2023

IN THE COURT OF KP Seguice Tebural, Pshawa Larer Al (Appellant) (Petitioner) (Plaintiff) VERSUS Police Departm Daiser Abha epartman (Respondent) (Defendant) I/We.

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

C. Guns

(CLIENT)

ACCEPTED

TAIMUR ALI KHAN Advocate High Court

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