

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

**Service Appeal No.535 /2023.**


Ex-Inspector Misal Khan No.P/34 of CCP Peshawar..... **Appellant.**

**VERSUS**

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others. .... **Respondents.**

**I n d e x**

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**DSP/Legal,  
CCP, Peshawar.**

(1)

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

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**VERSUS**

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others. .... **Respondents.**

**REPLY BY RESPONDENTS NO. 1 to 3.**

Khyber Pakhtunkhwa  
Service Tribunal

**Respectfully Sheweth:-**

Case No. 6693

**PRELIMINARY OBJECTIONS:-**

Dated 25/07/23

1. That the appeal is badly barred by law & limitation.
2. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
3. That the appellant has not come to Hon'ble Tribunal with clean hands.
4. That the appellant has no cause of action and locus standi to file instant appeal.
5. That the appellant is estopped by his own conduct to file the instant appeal.
6. That the appellant has concealed the material facts from this Hon'ble Tribunal.
7. That the appeal is not maintainable being devoid of any merit.

**REPLY ON FACTS:-**

1. First part of the Para Pertains to record hence needs no comments. However the performance of the appellant was not upto the mark as he has earned 35 bad entries 01 minor and 02 major punishments upon his credits on different occasions during his service.(Copy of list is attached as A )
2. Correct to the extent that an FIR No. 583 dated 2.06.2022 u/s 364/302/PPC & 7ATA, was registered in PS Shahpur by the complainant Muhammad Tariq S/O Salamat against culprits Ramzan Ali, Jansher, Lal Sher, S/O Shamsher and Abbas Alias Mohmanday, the motive was shown to be blood feud.
3. Incorrect. The appellant while posted at CCP Peshawar was placed under suspension and proceeded against departmentally on the charges that the appellant indulged in illegal activities and misconduct as he has maintained links with notorious criminals as well as proclaimed offenders (POs) in case vide FIR No. 583, dated 03.06.2022 u/s 365/302/109/PPC & 7-ATA PS Shahpur and also leaked secret information in arrest of POs in case ibid and allied with criminals, this act of the appellant tarnished the image of Police Department in the eyes of general Public. In this regard, he was issued Charge Sheet with Statement of Allegations and SP/Rural Peshawar was appointed as Enquiry Officer. During the course of Enquiry he was provided full opportunity of personal hearing and also recorded his statement, as well as also availed the opportunity of cross questioned.. The Enquiry Officer after thorough probe into the matter found him guilty of the charges leveled against him. The Competent Authority after receipt of the findings issued him final show cause

notice, which he replied, beside this, he was also heard in person in OR on 15.11.2022, but failed to defend himself, hence he was awarded major punishment of removal from service under Police Rules 1975 amended 2014. (Copy of charge sheet, Statement of allegations, Enquiry Report and FSCN are annexure as, B , C , D & E).

4. Incorrect. Para already explained in the above Para. Further, detailed departmental enquiry was conducted against him under rules ibid, wherein the allegations leveled against him were proved beyond any shadow of doubt. The appellant was also provided full opportunity of defense by recording his statement and also cross examined, but failed to advance any plausible grounds in rebuttal of the charges leveled against him. His act brought a bad name for the entire force, hence he was awarded punishment as per gravity of his misconduct.
5. Incorrect. Fair departmental enquiry was conducted as per rules ibid and the enquiry officer reported that charges leveled against the appellant were proved. The whole enquiry was conducted purely on merit by recording his statement as well as cross questioning and thereafter he was issued a final show cause notice, which he replied. The appellant was provided full opportunity of defense, but the appellant failed to defend himself. After fulfilling all codal formalities he was awarded major punishment as appellant committed gross misconduct.
6. Incorrect. The appellant filed departmental appeal, which was thoroughly processed and an ample opportunity of hearing was provided to the appellant by appellate authority but the appellant failed to defend himself with plausible/justifiable grounds, hence his appeal was rejected/filed.
7. That appeal of the appellant being devoid of merits and hit by limitation may be dismissed on the following grounds.

**REPLY ON GROUNDS:-**

- A. Incorrect. The punishment order passed by the lawful authority is just legal and has been passed in accordance with law/ rules and no violation of Article 4 & 10A have been done by the respondents, hence liable to be upheld.
- B. Incorrect. The appellant is giving wrong picture just to save his skin from commission of misconduct. The charges leveled against him are proved, hence he was awarded the major punishment. Presence of such black sheep in police force and any kind of leniency will encourage the misuse of authority.
- C. Incorrect. Detailed departmental enquiry was conducted against him in accordance with law/rules. During the course of enquiry his CDR was obtained wherein the appellant was remained in contact with the criminals (lal sher, jan sher, ramzan) for last one year or more without justified reason and given information regarding the operations of police after killing of Ihsan Ullah. Enquiry officer after detailed probe into the matter reported that the charges against the appellant were proved. His act brought a bad name for the entire force, hence he was awarded major punishment.(copy of CDR is annexure as F)
- D. Incorrect. The appellant was found involved in the objectionable activities related to gravest misconduct of having nexus with the above mentioned criminals and leakage of secret information due to which criminals easily escaped themselves from lawful arrest during raid

conducted at their harbours. In this regard a detailed inquiry was conducted against him, wherein the charges leveled against him were stand proved, hence he was rightly awarded major punishment.

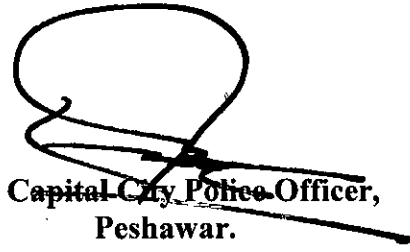
- E. Incorrect. A Proper departmental enquiry was conducted as per law/rules and the enquiry officer reported that charges leveled against the appellant were proved. The whole enquiry was conducted purely on merit. The appellant was provided full opportunity of defense, but the appellant failed to defend himself. After fulfilling all the codal formalities he was awarded the major punishment.
- F. Incorrect. para already explained in the above paras. Further, the appellant being a member of a disciplined force committed gross misconduct by giving secret information to criminals. The charges leveled against him were stand proved, hence he was awarded the major punishment.
- G. Incorrect. The appellant was rightly issued charge sheet with statement of allegations and clearly mentioned the charges that "he has allegedly been reported that you have been indulged in illegal activities and misconduct as you have maintained links with notorious criminals as well as Proclaimed Offender (POs) of case vide FIR No. 583 dated 03.06.2022 u/s 365/302/109/ PPC & 7-ATA PS Shahpur. It is further alleged that you have leaked secret information in arrest of POs in above mentioned FIR and allied with criminals. During the course of enquiry the charges mentioned in the charge sheet were proved against him.
- H. Incorrect. The appellant was provided proper opportunity of personal hearing and cross questioning was provided to appellant, but he failed to defend the charges leveled against him.
- I. Incorrect. The appellant was treated as per law/rules and no violation of the Article 10A has been done by the respondents.
- J. Incorrect. The appellant was associated with the enquiry proceedings and proper opportunity of personal hearing and cross questioning was provided to appellant but failed to defend the charges leveled against him.
- K. Incorrect. The appellant has preferred time barred departmental appeal, which was properly processed and also heard him in person by the appellate authority, however he failed to defend himself with plausible/justifiable grounds hence, filed/rejected because the charges leveled against him were proved.
- L. Incorrect. The competent authority before imposing the major punishment had completed all codal formalities and an ample opportunity of self defense/ personal hearing was provided, but the appellant failed to rebut the charges leveled against him.
- M. That the replying respondents also seek permission of this Hon'ble Tribunal to raise additional grounds at the time of arguments.

**PRAYERS:-**

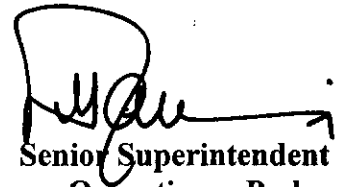
Keeping in view the above stated facts & reasons it is, most humbly prayed that the appeal of the appellant being devoid of merits, may kindly be dismissed with costs please.



**Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.**



**Capital City Police Officer,  
Peshawar.**



**Senior Superintendent of Police,  
Operations, Peshawar.**

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**VERSUS**

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others. .... **Respondents.**

**AUTHORITY.**

I, **Capital City Police Officer, Peshawar**, hereby authorize Mr. Inam Ullah DSP legal of Capital City Police, Peshawar to attend the Hon'ble Court and submit written reply, statement and affidavit required for the defense of above service appeal on behalf of respondent department.

~~Capital City Police Officer,  
Peshawar.~~

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

**Service Appeal No.535 /2023.**

Ex-Inspector Misal Khan No.P/34 of CCP Peshawar..... **Appellant.**


**VERSUS**

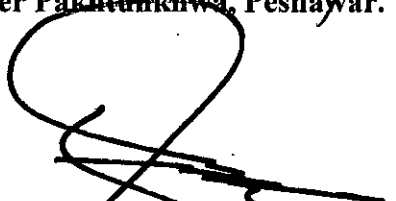
Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others. .... **Respondents.**

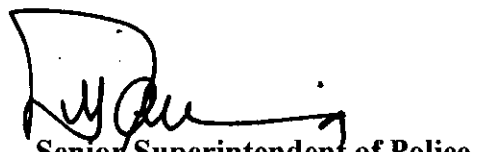
**AFFIDAVIT.**

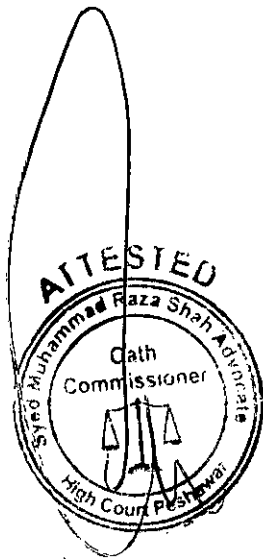
We respondents 1, 2 and 3 do hereby solemnly affirm and declare that the contents of the written reply are true and correct to the best of our knowledge and belief and nothing has concealed/kept secret from this Honorable Tribunal.

*it is further stated on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defence have been struck off.*

  
Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.

  
Capital City Police Officer,  
Peshawar.

  
Senior Superintendent of Police,  
Operations, Peshawar.



25 JUL 2023

BIO DATE OF MISSAL KHAN S/O ESSA KHAN FOR APPEARING IN THE ORDERLY ROOM

Name/No	Home Address	Date of Enlistment	Charges	E.O Name/Recom:	Punishment	Plea of the Applicant	Remarks/ Opinion of DSP/Legal	Order of the (CPO)				
Ex- Insp: Missal Khan No. P/54	Shahpur Peshawar	29.06.1989	<p>Shorts facts leading to the instant appeal are that the delinquent Inspector while posted at PBI HQR: Peshawar was proceeded against departmentally on the following charges:-</p> <ol style="list-style-type: none"> <li>1. It has been reported that he has been indulged in illegal activities and misconduct as he has maintained links with notorious criminals as well as proclaimed offenders (POs) of case vide FIR No. 583, dated 03.06.2022 u/s 365/302/109/7-ATA PS Shahpur.</li> <li>2. It is further alleged that he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.</li> <li>3. He has tarnished the image of police department in the eyes of general public.</li> </ol>	SP/Rural  Allegations proved	Dismissal from Service  By SSP/Ops: Peshawar  Vide order No. 3010-13/PA Dt: 16.11.2022  (Appeal on time)	Request to set-aside the punishment	Perusal of relevant record reveals that punishment awarded by the competent authority is commensurate to the gravity of misconduct committed by the defaulter Inspector.					
		Total Qlfy: Service										
		33 years, 03 months & 24 days.										
		D.O.B										
		30.03.1969										
		Education							Entries:-			
		FA										
		Courses							Bad	Minor	Major	Good
Lower Inter: upper	35	01	02	07								

Appeal Filed  
23/12

Attested  
[Signature]

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CHARGE SHEET

1. Whereas I, Lt Cdr @ Kashif Aftab Ahmad Abbasi, PSP, SSP/Operations Peshawar, am satisfied that a Formal Enquiry as contemplated by Police Rules 1975 is necessary & expedient in the subject case against **Inspector Misal Khan No. P/54 of CCP 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, Lt Cdr @ Kashif Aftab Ahmad Abbasi, PSP, SSP Operations, Pesh awar hereby charge **Inspector Misal Khan No. P/54 of CCP Peshawar** under Rule 5 (4) of the Police Rules 1975.

- i) It has allegedly been reported that you have been indulged in illegal activities and misconduct as you have maintained links with notorious criminals as well as Proclaimed Offenders (POs) of case vide FIR No. 583 dated 03.06.2022 u/s 365/302/109/7-ATA PS Shahpur.
- ii) It is further alleged that you have leaked secret information in arrest of P.Os in above mentioned FIR and allied with criminals.
- iii) He has tarnished the image of police department in the eyes of general public.
- iv) All this amounts to gross misconduct on your part and rendered you liable for punishment under Police (E.&D) 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.

*Accepted*  
*[Signature]*

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

انف ۱۷۳۰۱-۹۶۶۳۶۲۹-۳

میدر سپر انچارج پولیس پشاور  
توزیع شد

۱۷۳۰۱-۹۶۶۳۶۲۹-۳

۱۷۳۰۱-۹۶۶۳۶۲۹-۳

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1 J 01

STATEMENT OF ALLEGATIONS

1. I, Lt Cdr @ Kashif Aftab Ahmad Abbasi, PSP, SSP/Operations Peshawar as competent authority, am of the opinion that **Inspector Misal Khan No. P/54 of CCP Peshawar** has rendered himself liable to be proceeded against departmentally as he has committed the following acts/omission within the meaning of section 03 of the Khyber Pakhtunkhwa Police Rules, 1975.

- i) It has allegedly been reported that he has been indulged in illegal activities and misconduct as he has maintained links with notorious criminals as well as Proclaimed Offenders (POs) of case vide FIR No. 583 dated 03.06.2022 u/s 365/302/109/7-ATA PS Shahpur.
- ii) It is further alleged that he has leaked secret information in arrest of P.Os in above mentioned FIR and allied with criminals.
- iii) He has tarnished the image of police department in the eyes of general public.
- ii) All this amounts to gross misconduct on his part and rendered him liable for punishment under Police (E&D) Rules, 1975.

2. For the purpose of scrutinizing the conduct of afore said police official in the said episode with reference to the above allegations SP Rural 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.

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

No. 189 E/PA, dated Peshawar the

30/07/2022

Copy to:-

1. The Inquiry Officer.
2. The Delinquent official through PA to the EO officer

Attested  
*[Signature]*

*[Signature]*  
02/08/2022

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17301-9663629-3

(16)

21

OFFICE OF THE  
SUPERINTENDENT OF POLICE,  
RURAL, PESHAWAR.

No. 4076/PA: dated Peshawar the 28/10/2022.

To

The Senior Superintendent of Police,  
Operations, Peshawar.

Subject: DEPARTMENTAL ENQUIRY

Please refer to your office Endt: No. 189/E/PA, dated 30.07.2022; pertaining departmental enquiry against Inspector Misal Khan.

STATEMENT OF ALLEGATION:

- Misal Khan*
- i. It has been reported that he has been indulged in illegal activities and misconduct as he has maintained links with notorious criminals as well as proclaimed offenders (POs) of case vide FIR No. 583 dated 03.06.2022 u/s 365,302,109,7-ATA PS Shahpur.
  - ii. It is further alleged that he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.
  - iii. He has tarnished the image of police department in the eyes of general public.
  - iv. All this amounts to gross misconduct on his part and rendered him liable for punishment under Police (E&D) Rules, 1975.

PROCEEDING:

- Personal hearing.
- Recording of statement.
- Collection of CDR and posting record.
- Criminal record of Lal Sher group vide this office memo No. 2112/PA dated 02.08.2022.

Enquiry officer provided reasonable opportunity to Inspector Misal Khan. Statement of allegation was served upon him and his written reply was recorded and he was cr questioned too. His CDR was obtained from CFU vide this office letter No. 2113/PA dated 02.08.2022. His posting record was also sought from concerned office vide this office letter No. 2113/PA dated 02.08.2022.

SCOPE OF ENQUIRY:

The scope of the enquiry includes supporting these criminals (Lal Sher, Jan Sher, Ramzan and rest of the family) in criminal cases in particular and in normal circumstances in general. Giving information regarding the operations of the police. It also includes being in contact with them for last one year or more without justified reasons. Being in contact with the above mentioned group after the killing of Haji Ihsan Ullah.

*Attested  
Signature*

(11)

**STATEMENT OF INSPECTOR MISAL KHAN:**

Inspector Misal Khan was called to the office and his statement was recorded which is attached.

**CROSS QUESTIONS:**

Q: - Why were you dismissed from service in 2008?

Ans: - I was company hawaldar and collected mobiles etc from the recruits, but during the returning of said items, deficiencies were found. In which, departmental proceeding was initiated and I was dismissed from service.

Q: - Do you know Jan Sher, Ramzan and Lal Sher etc?

Ans: - Yes, since 20,25 years.

Q: - What are their activities and reputation in the area?

Ans: - Suspicious/ involved in illegal activities, killing of innocent people, land grabbing and extortion.

Q: - Do you have any relationship with Javed, Asfandyar group?

Ans: - Yes, I have relations with both the parties.

Q: - Why Muhammad Hussain SI (police official) was killed by Lal Sher group?

Ans: - He was killed by them without any good reason and he was killed innocently.

Q: - Did you knowing about the illegal activities of Jan Sher etc and have information regarding killing of innocent people?

Ans: - Yes.

Q: - Do you know about the killing of innocent women by Jan Sher etc?

Ans: - Yes.

Q: - Do you know the said group is land mafia?

Ans: - Yes.

Q: - Were you in contact with Jan Sher, Ramzan etc and since when?

Ans: - Yes, since long.

Q: - The above mentioned accused is your blood relatives?

Ans: - No

Q: - On the day of occurrence, why you contacted Jan Sher?

Ans: - My son purchased the land from him and I told Jan Sher to write the affidavit of the said land.

*Attested  
Signature*

Q: - On the day of occurrence at 17:24, why you contacted accused Ramzan?

Ans: - To asked about the Jirga of the land dispute.

Q: - Did you know by that time that they have abducted and killed Haji Ihsan Ullah?

Ans: - No.

Q: - Did you know about the Whatsapp message and video regarding abduction and killing of Haji Ihsan Ullah?

Ans: - No.

Q: - Do you know that Jan Sher is PO and wanted to different PSSs?

Ans: - Yes

Q: - When you know everything about Jan Sher, Lal Sher etc, why you are in contact with them?

Ans: - Again replied because of land dispute.

Q: - Your contacts with Jan Sher show very longer duration of calls, can you explain?

Ans: - Yes, it was all about the land dispute.

Q: - Number of cases in which you supported Jan Sher etc?

Ans: - None.

Q: - How many cases you investigated of Lal Sher group?

Ans: - None except one of PS East Cantt against Lal Sher.

Q: - Why didn't you lodge complaint against Jan Sher etc regarding illegal possession of your land?

Ans: - Because a Jirga was busy to sort out the issue.

Q: - It was a cognizable offence?

Ans: - Yes.

Q: - Now, if it is cognizable offence, why didn't you lodge a complaint against them?

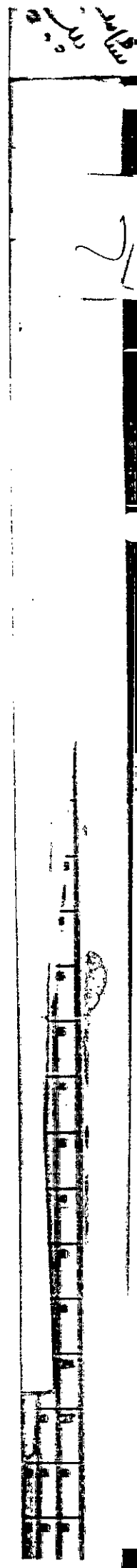
Ans: - Because a Jirga was busy to sort out.

Q: - If you being a police officer and Inspector went to the hujra of Jan Sher, Lal Sher etc to sort out your land dispute, what will the poor and common men do?

Ans: - No answer.

Q: - If you know about their activities, they have remained POs at various times and have killed innocent people including police officers and are land

*Attested*



grabbers/extortionists, than what was the reason of sitting and meeting with them?

Ans: - I went to their hujra once and school near to his hujra in connection of inspection of a school where the poling/ election was to be held. However, I have been going to their house for functions and on demise of close relatives for Fateha.

Q: - Again questioned that being a police officer why you helped them?

Ans: - They are my relatives.

Q: - Are they your blood relatives?

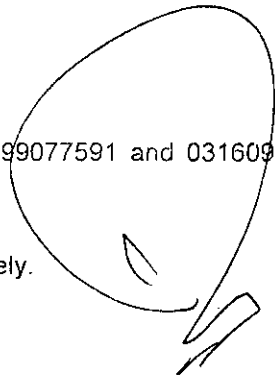
Ans: - No.

Q: - As a police officer, knowing fully well that they are known criminals of the area and you are not even their blood relatives, can you justify your relationship with them?

Ans:- Silence (No answer).

Q: - Do you know that number 03160242424, 03199077591 and 03160901144 are being used by whom?

Ans: - Yes, Jan Sher, Ramzan and Lal Sher respectively.



**FINDINGS:**

1. That Lal Sher, Jan Sher, Ramzan etc are involved in land grabbing, extortion, killing of innocent people as well as killing of innocent women.
2. That they are also involved in the killing of police officers.
3. That they are involved in illegal activities since 20,25 years.
4. That entire family involved in criminal activities, (criminal record is attached).
5. That there are many police officers who are their friends and supporters.
6. That they also harass police officers by using many techniques i.e submitting false applications in courts and to superior officers just to stop them from performing the lawful duties.
7. That it is because of these police officers that they have been able to reach that much level of the criminality.
8. That the testimony to the fact above is that there is not a single FIR of Extortion and land grabbing against them in Peshawar contrary to the ground facts and realities.
9. That there are contradictions in the statement of Inspector Missal Khan and cross questioning.
10. That his statement is reflective of the fact that instead of replying to the allegation alleged, he tried to challenge the lawful right of superior officers to show cause him.
11. That he knew that the above mentioned group is wanted and are POs and have been POs all along as he confessed this fact during the cross questioning but he mentioned

*Attestd by*  
*[Signature]*

12. That Jan Sher, Lal Sher etc. helped him for possession of 10 marla land and carrying out Jirga for that.
13. That according to his statement, he has land dispute with Lal Sher and Jan Sher etc. however, as per evidence submitted by him (attached) accused Ramzan who is brother of Lal Sher and Jan Sher, acted as mediator in the said dispute. ***This is reflective of the fact that he had been getting favors from this notorious group which can not be one sided.***
14. That he confessed that the above mentioned group is involved in land mafia, killing of innocent people as well as killing of police officials.
15. That he was in contact with the above mentioned group after the killing of Haji Ihsan Ullah who was killed by Jan Sher etc.
16. That he also confessed that he is in relationship with Javed, Asfandyar group, who is also involved in land mafia and killing of people.
17. That he had been in contact with them since 20/25 years without any justified reason.
18. That being a close friend and being in contact with them how it is possible that till 6:00 PM he was unaware regarding the incident? The news was also shared on the day of incident at 2:30 PM in different social media groups.
19. That he admitted that he has been coming to their family functions ~~all along~~ since 20-25 years without any blood relation.
20. That being a police officer it is necessary to avoid contacts with criminals and other people having illegal activities, but, Inspector Misal Khan failed to do this.
21. That he had been hands and gloves with Lal Sher group etc. throughout their criminal history.
22. That if Lal Sher group has gone very high up the ladder of criminality, police officers like Inspector Misal Khan have contributed to this. As, it is a universal and recognized fact that a criminal/ a criminal gang/ a mafia/ a cuts cannot move up the ladder of criminality without the assistance of police officer.
23. That in his reply submitted in response to SCN, instead of submitting or clearing around his allegation, he states that "accused family in known elders of the area", as per facts, they are criminals of the area.
24. That he admits criminals as elders of the area which shows his connivance with them and his tolerance towards criminals which is unacceptable and unjustifiable as police officer.
25. That as far as, being Nazim of area is concerned, that doesn't give any person a reason to justify crimes of a criminal or a criminal group.
26. That it is established that as and when he was contacting accused Jan Sher/ Lal Sher/ Ramzan, they were outlaws and wanted in different police stations as their criminal record shows which is attached.
27. That this officer has 32 contacts with the above mentioned group. Calls details are as under, which is tip of the iceberg as most of the people now contact on Whatsapp and different social media applications :-
  - 32 calls in total before and after the incident.
28. That he was in contact with them till their number went switched off.

Attested  
[Signature]

CONCLUSION:

In view of above, analyzing of the statement of Inspector Misal Khan, cross questioning, intelligence sources and other available material the " *all allegations against him are proved.*

Capt (R) Saleem Abbas Kulachi (PSP)  
Enquiry Officer,  
Superintendent of Police,  
Rural, Division,  
Peshawar.

Alles fed  
Culachi





SENIOR: SUPERINTENDENT  
(OPERATIONS),  
PESHAWAR  
Phone. 091-9213054

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No. 2891 /PA

Dated Peshawar the 02 /11, 2022

**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 **Inspector Misal Khan** No. P/54 as follows:-
2. (i) That consequent upon the completion of enquiry committee conducted against you by SP Rural 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 bearing No. 189/PA dated 30.07.2022.

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.

Attest by  
[Signature]

[Signature]  
3/11/22

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

[Signature]

operations of the police. It also includes being in contact with them for last one year or more without justified reasons. Being in contact with the above mentioned group after the killing of Haji Ihsan Ullah.

جان سیر کے ساتھ رابطہ

A -0316-0242424

Call Type	A	B	Date/Time	SECS	IMEI	Location of A
Call - Incoming	3160242424	3115454223	01/02/2022 10:11:13	443	860217043914270	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3160242424	3115454223	01/04/2022 20:51:35	85	860217043914270	Plot # 164-A/S-1, Khayaban-e-Sir Syed, T&D Rawalpindi
Call - Incoming	3160242424	3115454223	01/04/2022 21:04:13	32	860217043914270	Street no 23, near PTCL Customer Centre, I-10/4, Islamabad
Call - Outgoing	3160242424	3115454223	02/12/2022 12:35:55	173	359617271975680	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3160242424	3115454223	02/14/2022 10:35:33	101	359617271975680	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3160242424	3115454223	02/16/2022 09:52:05	899	359617271975680	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3160242424	3115454223	02/16/2022 10:07:26	70	359617271975680	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3160242424	3115454223	02/17/2022 12:16:48	150	359617271975680	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3160242424	3115454223	02/18/2022 11:09:50	342	359617271975680	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3160242424	3115454223	03/02/2022 19:18:24	17	359617271975680	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3160242424	3115454223	03/05/2022 09:38:06	182	359617271975680	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3160242424	3115454223	03/09/2022 16:11:27	9	359617271975680	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3160242424	3115454223	03/20/2022 18:40:51	76	359617271975680	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3160242424	3115454223	04/02/2022 07:35:16	127	359617271975680	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3160242424	3115454223	05/23/2022 11:21:00	43	359617271975680	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3160242424	3115454223	05/25/2022 09:10:13	200	359617271975680	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3160242424	3115454223	05/25/2022 13:13:57	16	359617271975680	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3160242424	3115454223	06/19/2022 18:15:52	464	352206203023620	Wadpagg, Peshawar, KPK
Call - Incoming	3160242424	3115454223	06/19/2022 21:56:30	117	352206203023620	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3160242424	3115454223	06/22/2022 20:55:05	23	352206203023620	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3160242424	3115454223	06/22/2022 22:10:23	445	352206203023620	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3160242424	3115454223	06/23/2022 16:18:06	51	352206203023620	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3160242424	3115454223	06/23/2022 16:21:10	340	352206203023620	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3160242424	3115454223	06/23/2022 16:38:44	41	352206203023620	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar

Attest  
17/4/22

کریٹیمیشنوں کے لئے درخواستیں جمع کرائیں اور ان کی کاپیاں مندرجہ ذیل پر بھیجیں۔  
 265 FIR نمبر  
 2756 نمبر  
 Ps Shahid  
 200/108

18)

Call Type	A	B	Date/Time	SECS	IMEI	Location of A
Call - Incoming	3199077591	3115454223	03/26/2022 21:19:48	311	351594341393050	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3199077591	3115454223	03/29/2022 12:17:35	695	351594341393050	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3199077591	3115454223	04/01/2022 15:59:40	194	351594341393050	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3199077591	3115454223	04/07/2022 22:16:16	448	351594341393050	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3199077591	3115454223	06/26/2022 17:24:10	30	351594341393050	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar

SEARCHED  
INDEXED

میرے سینوں کو پریشان کرنے کی کوشش کی گئی۔ یہ سب اس کیس میں شامل ہے۔  
کیشل تجہیدہ 2756 بجوائے ملے ہیں۔  
پشاور پشاور 302/109  
265 FIR درج ہے۔  
2022-07-02

6
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3115454223 Insp.Misal Khan

Call Type	A	B	Date/Time	SECS	IMEI	Location of A
Call - Outgoing	3160901144	3115454223	02/19/2022 17:32:16	42	359392241747860	PTCL Colony, Peshawar
Call - Outgoing	3160901144	3115454223	03/28/2022 09:41:01	73	359392241747860	Judical Complex, Peshawar
Call - Outgoing	3160901144	3115454223	03/31/2022 11:48:11	56	359392241747860	Japan bussines Center,

199

Handwritten signature or stamp.

Handwritten notes in Urdu and English. Includes: "FIR No. 265", "Peshawar", "302/109", "02-07-022", "34", "022", "1959".

Handwritten notes and a small table fragment at the bottom right corner.