

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 536/2023

Mr. Zarshad Khan.....Appellant

Versus

PPO etcRespondents

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Through

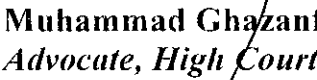
Appellant


Khaled Rahman
Advocate,
Supreme Court of Pakistan

&


Muhammad Amin Ayub
Advocate, High Court

&


Muhammad Ghazanfar Ali
Advocate, High Court

4-B, Haroon Mansion
Khyber Bazar, Peshawar
Off: Tel: 091-2592458
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Dated: 31 /08/2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 536/2023Khyber Pakhtunkhwa
Service TribunalDiary No. 7315Dated 11/9/2023

Mr. Zarshad KhanAppellant

Versus

PPO etcRespondents

**REJOINDER ON BEHALF OF APPELLANT IN RESPONSE
TO REPLY FILED BY RESPONDENTS.**

Respectfully Sheweth,

Preliminary Objections:

That appellant has approached this Hon'ble Tribunal by asserting valuable facts and nothing has been concealed while have locus standi, therefore, the Hon'ble Tribunal having the jurisdiction to entertain the matter. Estoppel does not run against the law.

Facts:

1. Absolutely misconceived hence not admitted. It is apprised that appellant from the very inception of his service was never found to be guilty and rendered meritorious services till last.
2. Needs no reply.
- 3-5. Incorrect. The allegations were altogether ill-founded. Moreover, the departmental enquiry was also conducted in an improper manner as no such material is/was available on record which could substantiate the charges leveled against the appellant which is no justification for imposition of awarding major penalty upon which appellant elaborated each and every fact concerning baseless allegations in the reply of Charge Sheet. It is contended that reply to the Show Cause Notice furnished by the appellant was not taken into consideration,

therefore, the same reflects negation of Rule-7 of Khyber Pakhtunkhwa E&D Rules-2011 which mandates that after considering the reply the Authority is bound to aver his own opinion upon the charges which were leveled against the delinquent servant. Furthermore, charges stood unproved during the course of so called regular inquiry rather the inquiry was commenced in shape of questionnaire which is not permissible under the law and against natural justice.

6. Absolutely incorrect. Neither the departmental appeal of the appellant was decided by applying judicial mind nor was he afforded opportunity of personal hearing.
6. Incorrect. The instant appeal is well within time.

Grounds:

A&B. Incorrect hence not admitted. Appellant was not dealt with as per the mandate of Article-4 & 10A of the Constitution of the Islamic Republic of Pakistan, 1973. As already explained hereinabove that no legality exists in the departmental proceedings nor appellant was treated fairly and justly. The brother of the Appellant namely Shamshad Khan is the Chairman of the locality as is evident from his Membership Card (*Annex;- RJ/1*) and Election Result (*Annex;- RJ/2*).

C-E. Not admitted as asserted. It is absolutely necessary to bring into the notice of the Tribunal that the Answering Respondents have adopted a pick and choose policy in the matter. Initially, as many as 22 Police officials were proceeded against and suspended vide order dated 29.07.2022 against whom disciplinary actions were started but later on the appellant was administered full dose and removed from service inspite of his longstanding service whereas other similarly placed officials who were found to have been similar roles, were either let off the hook or awarded minor/lesser punishments. The details are as under:-

S.No	Name/Designation	Enquiry Findings	Enquiry Recommendation	Penalty
1.	HC Bashir Khan	59 contacts with accused proved	Not proved	Exonerated
2.	IHC Mukhtiar ullah	9 contacts with accused proved	Not Proved	Minor Penalty
3.	Muhammad Riaz PASI	9 contacts with accused proved	Partially proved	Minor Penalty
4.	Asfandyar ASI	Contact established with accused proved	Partially proved	Minor Penalty
5.	Sajawal Khan ASI	15 Contacts with accused proved	Partially proved	Minor penalty
6.	Arif ullah FC	6 contacts with accused proved	Not proved	Exonerated
7.	Rashid Ali LHC	5 contacts with accused proved	Not Proved	Exonerated
8.	Muhammad Irshad ASI	Contact established	Not Proved	Exonerated
9.	Izhar FC	4 contacts with accused partially proved	Not Proved	Minor Penalty
10.	Yousaf Jan Inspector	4 contacts before incident proved	Not Proved	Exonerated
11.	Syed Waqar Ali Shah HC	8 Contacts proved with accused	Not Proved	Exonerated
12.	Fakhre Alam DFC	39 contacts proved with accused	Not Proved	Exonerated
13.	Shaukat FC	3 contacts proved with accused	Not Proved	Exonerated
14.	Amjid Khan HC	7 contacts proved with accused	Partially proved	Minor Penalty
15.	Irfan ullah IHC	7 contacts proved with accused	Not Proved	Exonerated

(Record Annex;- RJ-3)

In this view of the matter the impugned orders cannot be sustained.

F-L. Incorrect. The detailed reply has already been given in the preceding paras.

It is, therefore, humbly prayed that the reply of answering Respondents may graciously be rejected and the appeal as prayed for may graciously be accepted with costs.

Through

Appellant

Khaled Rahman
Advocate, Peshawar

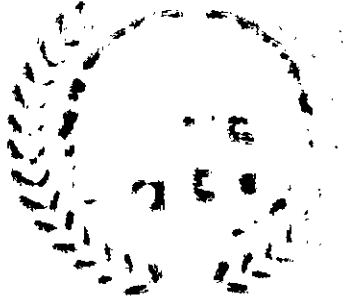
Dated: 21 /08/2023

Verification

Verified that the contents of this rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Appellant

RT/1



Code No. 04



[Handwritten signature]

Name: Shamshad Khan
Chairman VC (04) Dalazak-1
CNIC: 17301-8860672-1



RT/1

Father Name: Bahadar Khan

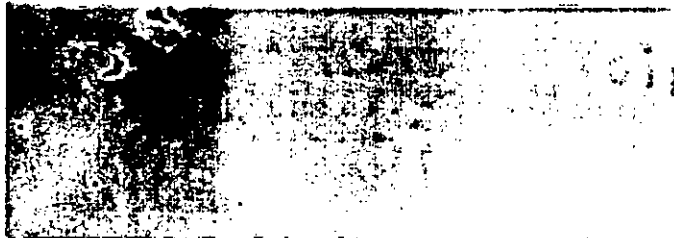
Date of Birth: 06-03-1958

Blood Group Nil

Issue Date: 01-01-2023

Contact No: 0345-9128943 Emergency Contact: 0311-0574284

Address: P.O Dalazak Road Village Dalazak Peshawar



RJ/2

FORM-NIX
(see rule 46(1))

PROVISIONAL CONSOLIDATED STATEMENT OF RESULTS OF THE COUNT
Election to the Local Government

1. Name and Name of Local Council
2. Category of Seat
3. Total number of Polling Stations
4. Number of registered voters in the constituency:
5. Total number of votes polled
6. Number of valid votes polled
7. Number of votes excluded from the count
8. Percentage of votes polled

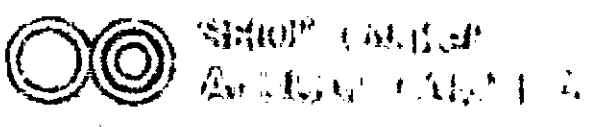
General State
District Peshawar
Female
Total 3026
2848
1721
1603
118
34 %

S.No.	Name of Contesting Candidate	*Party affiliation/ **Election Symbol	Number of Votes Obtained
1	Fazal Ullah Khan	کری (55)	194
2	Ghulam Ishaq	حرسوس (5)	103
3	Sayed Ullah Rehman	پارہاں (2)	158
4	Muhammad Khan	کلا (12)	436
5	Muhammad Ali	اکور خوش (10)	89
6	Siraj Muhammad	پنگر (11)	221
7	Taufiq	کونڈ (34)	157
8	Zaman Khan	بگر (1)	245

ADNAN

- Govt. Institute for Visually Impaired Children (Blind School) Main (GT Road) Pesh
31/02/2021

(Adnan Nawaz)
Assistant Engineer
LG & RDD Peshawar
Returning Officer - 32



RJ/2

7 Rj/3

**OFFICE OF THE
SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR.**

No. 4086/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. 175/E/PA, dated 30.07.2022; pertaining to departmental enquiry against HC Bashir Khan No. 5221.

STATEMENT OF ALLEGATION:

- 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 HC BASHIR KHAN. Statement of allegation was served upon him and his written reply was recorded and he was cross 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

R/3

3

STATEMENT OF HC BASHIR KHAN NO. 5221:

HC Bashir Khan No. 5221 was called to the office and his statement was recorded which is attached.

CROSS QUESTIONS:

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

Ans: - Yes.

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

Ans: - He was killed by them without any reason.

Q: - Did you know 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: - 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: - Because they are relatives.

Q: - They are your blood relatives?

Ans: - Yes.

Q: - Why you helped them in criminal cases?

Ans: - Failed to justify.

Q: - Can you explain the reason of 59 contacts with the group?

Ans: - No answer.

ATTESTED

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 application in courts and superior officers just to stop them from performing their 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 he confessed that the above mentioned group is involved in land mafia, killing of innocent people as well as killing of police officials.
10. That he was in contact with the above mentioned group.
11. That being a police officer it is necessary to avoid contacts with criminals and other people having illegal activities, but, HC Bashir Khan failed to do this.
12. That as far as, being Nazim of area does not give any person a reason to justify crimes of a criminal.
13. That he is very close relative of above mentioned accused, he is the son of maternal aunt of the accused.
14. That he lives in the same village as of the accused, Mohammad Zai.
15. That this officer has 59 contacts with above mentioned criminals (incoming and outgoing both).

CONCLUSION/ RECOMMENDATION:

In view of above, analyzing of the statement of HC Bashir Khan No. 5221, cross questioning, intelligence sources and other available material the "~~allegations against him are not proved~~".

ATTESTED

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

5221

Fc

شیرکان

مدیر جان شیر

Call Type	A	B	Date/Time	SECS	IMEI	Location of A
Call - Incoming	3138080457	3160242424	05/13/2022 21:33:00	21	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3138080457	3160242424	05/13/2022 21:41:06	19	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3138080457	3160242424	05/13/2022 21:41:51	20	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3138080457	3160242424	05/13/2022 21:45:05	33	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3138080457	3160242424	05/27/2022 15:23:18	672	356962095434660	Mardan Rd, Kandar Stop, Muhallah Kochian, Nowshehra
Call - Outgoing	3138080457	3160242424	06/03/2022 11:58:02	33	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3138080457	3160242424	06/25/2022 13:01:01	42	356962095434660	Kashti pul. Sahna & PO Nowshehra Kalan. Noshehra
Call - Incoming	3138080457	3160242424	06/25/2022 13:18:35	1451	356962095434660	Mardan Rd, Kandar Stop, Muhallah Kochian, Nowshehra

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ATTESTED

5221
FC Fe → رشان ←

Call Type	A	B	Date/Time	SECS	IMEI	Location of A
Call - Incoming	3138080457	3199077591	04/18/2022 17:59:55	74	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3138080457	3199077591	04/23/2022 12:31:40	44	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3138080457	3199077591	05/01/2022 20:53:49	47	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3138080457	3199077591	05/06/2022 05:51:40	54	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3138080457	3199077591	05/13/2022 17:34:43	42	356962095434660	VILLAGE JHOGIYAN , DAAK KHANA, TARNAB FARM, T&D PESHAWAR
Call - Incoming	3138080457	3199077591	05/13/2022 20:31:22	13	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3138080457	3199077591	05/17/2022 11:45:17	116	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3138080457	3199077591	05/17/2022 21:31:45	19	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3138080457	3199077591	06/03/2022 11:56:57	24	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3138080457	3199077591	06/05/2022 08:22:34	70	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3138080457	3199077591	06/05/2022 10:52:21	27	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar

TESTED

5221
Fc

ملزم لکھنؤ → بکتر Fc

Call Type	A	B	Date/Time	SECS	IMEI	Location of A
Call - Outgoing	3138080457	3160901144	03/29/2022 20:43:42	73	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3138080457	3160901144	06/05/2022 10:40:32	21	356962095434660	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar

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ATTESSED



13

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

ORDER

This office order will dispose-off the departmental proceedings against HC Bashir Khan No. 5221 while at CCP Peshawar was placed under suspension and proceeded against departmentally on the allegations/charges 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 and he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.

2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Rural was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement of HC Bashir Khan No. 5221, cross questioning, reports from intelligence sources and other available material the allegations against could not be proved.

3. On receipt of findings of the enquiry officer, he was called in Orderly Room and heard in person on 01.11.2022. The accused official during personal hearing defend himself against the charges leveled against him. Keeping in view of the above, the undersigned being a competent authority do agree with the recommendation of the enquiry officer, therefore, HC Bashir Khan No. 5221 is hereby exonerated from the allegation leveled against him. Hence the enquiry against him is hereby filed. He is reinstated into service from the date of suspension.

Order announced.

(IA Cdr @ KASHIF AFTAB AJMAD ABBASI)PSP
Senior Superintendent of Police
(Operations) Peshawar

No. 2859-62 PA dated Peshawar, the 02/11/2022.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. PO, OASI, CRC
3. FMC along with complete enquiry file for record (1/4).

ATTESTED

14
OFFICE OF THE
SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR.

No. 4683 /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. 190/E/PA, dated 30.07.2022; pertaining to departmental enquiry against IHC (Mukhtiar Ullah) No. 1201.

STATEMENT OF ALLEGATION:

- 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. 2113/PA dated 02.08.2022.

Enquiry officer provided reasonable opportunity to IHC Mukhtiar Ullah. Statement of allegation was served upon him and his written reply was recorded and he was cross 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

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15

STATEMENT OF IHC MUKHTIAR ULLAH:

IHC Mukhtiar Ullah No. 1201 was called to the office and his statement was recorded which is attached.

CROSS QUESTIONING:

Q:- What was the reason of contact with accused Jan Sher?

Ans:- Jan Sher was complainant in case vide FIR No. 72 dated 17.07.2020; u/s 201.148.149.364.387.7-ATA.302.109 PS Shahpur. In which circle officer namely Inspector Javed Iqbal investigated the case. Inspector Javed told to inform the complainant namely Jan Sher to assist local police to complete the investigation process.

Q:- Jan Sher, Lal Sher etc called you many times, can you explain the reason?

Ans:- He was calling but I was ignoring him and told him that call circle officer for any investigation or other work as he is Muharrar Investigation.

Q:- The case registered on 01.07.2020 and the accused released before your contacts, can you explain?

Ans:- Failed to justify.

Q:- Why you shared the fake information to a news reporter?

Ans:- DSP Sikandar Shah called and asked about Amjid (martyred), I answered to DSP Sikandar. In which, DSP Sikandar Shah told that Ihsan reported will be called you and directed that talk to him. I turned off the mobile and after 4 hours on 09:00 PM Ihsan called and asked about date of incident of martyred Amjid.

Q:- Why you give information to a reporter without confirmation of belt number?

Ans:- I was unaware regarding the propaganda will be shared against department I gave the information on the direction of DSP Sikandar Shah.

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 officials.
3. That they are involved in illegal activities since 20,25 years.
4. That entire family are 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 their lawful duties.
7. That it is because of these police officers that they have been able to reach that much level of criminality.

ATTACHED

16

8. That the testimony to the facts 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 he was called on the direction of circle officer.
10. That the information was shared on the direction of DSP Sikandar Shah.
11. That this officer has 9 contacts with above mentioned group (incoming and outgoing both).
- 12.
13. That this officer tarnished the image of department by sharing fake information to a reporter and bringing bad name to the department.

CONCLUSION/ RECOMMENDATION

In view of above, following is recommended:

1. In the light of above, cross questioning, analyzing the CDR, intelligence sources and statement of delinquent official, **the allegation against IHC Mukhtiar Ullah No. 1201 are not proved.**

However, he is guilty of conspiracy against police department by giving a false information to a news reporter for tarnishing the image of the police and also to bring bad name to the good step taken by superiors against involved officials.

2. Departmental proceedings may be initiated against DSP Sikandar Shah for misconduct and asking his subordinate to share/ give information about a Shaheed to a crime reporter without confirmation which brought bad name to the department as it was covered in headlines that a Shaheed police officer has been suspended for relations with criminals.

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

REGISTERED

مقدم جان شير / He / فيسار الله

Call Type	A	B	Date/Time	SECS	IMEI	Location of A
Call - Incoming	3156718802	3160242424	09/10/2021 12:37:44	1	358811075982270	Chamkani Phaatak, Peshawar
Call - Incoming	3156718802	3160242424	09/23/2021 11:39:03	54	358811075982270	Chamkani Phaatak, Peshawar
Call - Incoming	3156718802	3160242424	05/10/2022 12:50:27	19	358811075982270	PTCL Colony, Peshawar
Call - Outgoing	3156718802	3160242424	05/10/2022 15:00:02	142	358811075982270	Chamkani Phaatak, Peshawar
Call - Incoming	3156718802	3160242424	05/10/2022 18:45:14	211	358811075982270	Chamkani Phaatak, Peshawar
Call - Incoming	3156718802	3160242424	05/11/2022 11:38:11	67	358811075982270	Chamkani Phaatak, Peshawar
Call - Incoming	3156718802	3160242424	05/11/2022 15:37:26	46	358811075982270	Chamkani Phaatak, Peshawar
Call - Incoming	3156718802	3160242424	05/11/2022 19:58:36	284	358811075982270	Ghrumbak. Charsadda

17

TESTED



18

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

ORDER

This office order will dispose-off the departmental proceedings against IIC Mukhtiar Ullah No. 1201 while posted at CCP Peshawar was placed under suspension and proceeded against departmentally on the allegations/charges 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 Shabpur and he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.

2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Rural was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement of IIC Mukhtiar Ullah No. 1201, cross questioning, analyzing the CDR, intelligence sources and other available material are not stands proved. However, he is guilty of conspiracy against police department by giving false information to a news reporter for tarnishing the image of police and also to bring bad name to the step taken by superiors against involved officials.

3. On receipt of findings of the enquiry officer, he was called in Orderly Room and heard in person on 01.11.2022. The accused official during personal hearing could not defend himself against the charges leveled against him. Keeping in view of the above, the undersigned being a competent authority do agree with the recommendation of the enquiry officer, therefore, IIC Mukhtiar Ullah No. 1201 is hereby awarded minor punishment of "Forfeiture of approved service for two years. He is reinstated into service from the date of suspension.

Order announced.

(Lt Cdr @) KASHIF AFTAB AJMAD ABBAS PSP
Senior Superintendent of Police
(Operations) Peshawar

No. 2851-54 PA dated Peshawar, the 02/11/2022.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. IC-II, PO, OASI, CRC
3. BMC along with complete enquiry file for record (2-1)

ATTESTED

19
1

**OFFICE OF THE
SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR.**

No. 4077/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. 186/E/PA, dated 30.07.2022; pertaining to departmental enquiry against PASI Muhammad Riaz.

STATEMENT OF ALLEGATION:

- 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 PASI Muhammad Riaz. Statement of allegation was served upon him and his written reply was recorded and he was cross 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

2

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STATEMENT OF PASI MUHAMMAD RIAZ:

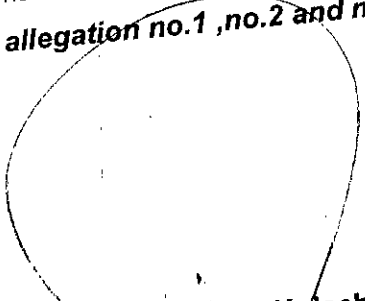
PASI Muhammad Riaz was called to the office and his statement was recorded which is attached.

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 officials.
3. That they are involved in illegal activities since 20,25 years.
4. That entire family are 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 their 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 this officer is neighbour of the accused and lives in same village.
10. That accused Jan Sher called him twice for different which he declined to comply with.
11. That no evidence could be found to substantiate/to prove allegation no.2 and 3.
12. That as a police officer, he should have restrained himself for contacts with such criminal gang.
13. That this officer has 9 contacts with Jan Sher (incoming and outgoing both).

CONCLUSION:

In view of above, analyzing of the statement of PASI Muhammad Riaz No. 22/P, cross questioning, intelligence sources and other available material **"the allegation no.4 of misconduct stands proved only" and he is not guilty of allegation no.1, no.2 and no.3.**



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

ATTESTED

22/P ملزم جان شير → محمد رياض PA

Call Type	A	B	Date/Time	SECS	IMEI	Location of A
Call - Incoming	3149277201	3160242424	04/26/2022 15:26:25	87	868344038459140	Tamur plaza gulbahar 2 opposite shell pump, gulbahar Peshawar.
Call - Outgoing	3149277201	3160242424	04/26/2022 15:34:43	68	868344038459140	Grand Trunk Rd, Zaryab Colony, Peshawar
Call - Outgoing	3149277201	3160242424	04/26/2022 15:49:48	20	868344038459140	Hassan Market,, G.T road , Chughualpura, Peshawar.
Call - Incoming	3149277201	3160242424	04/26/2022 17:40:26	22	868344038459140	Mouza Arazi 1,T&D Peshawar
Call - Outgoing	3149277201	3160242424	04/26/2022 17:59:08	37	868344038459140	Main GT Road, Near Wapda Power House, Anees Tower, Peshawar
Call - Outgoing	3149277201	3160242424	04/26/2022 18:03:08	51	868344038459140	Main GT Road, Near Wapda Power House, Anees Tower, Peshawar
Call - Incoming	3149277201	3160242424	04/26/2022 18:21:59	78	868344038459140	Main GT Road, Near Wapda Power House, Anees Tower, Peshawar
Call - Incoming	3149277201	3160242424	04/26/2022 18:29:19	19	868344038459140	Javaid Town Gulberg Town No. 4, Opp Gulshan Colony Peshawar
Call - Incoming	3149277201	3160242424	04/26/2022 18:36:15	166	868344038459140	Alhaj Market. Garhi Nawab Khan.G.T Rd Peshawar

21

ATTESTED



-22

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

ORDER

This office order will dispose-off the departmental proceedings against PASI Muhammad Riaz No. 22/P while at CCP Peshawar was placed under suspension and proceeded against departmentally on the allegations/charges 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 and he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.

2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Rural was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement of PASI Muhammad Riaz No. 4655, cross questioning, reports from intelligence sources and other available material the allegations No. 4 of the charge sheet stands proved.

3. On receipt of findings of the enquiry officer, he was called in Orderly Room and heard in person on 01.11.2022. The accused official during personal hearing could not defend himself against the charges leveled against him. Keeping in view of the above, the undersigned being a competent authority do agree with the recommendation of the enquiry officer, therefore, PASI Muhammad Riaz No. 22/P is hereby awarded minor punishment of "Stoppage of increment for six months. He is reinstated into service from the date of suspension.

Order announced.

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

No. 2871-74 PA dated Peshawar, the 02/11/2022.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. EC-II, PO.
3. FMC along with complete enquiry file for record (/6).

ATTESTED

23

**OFFICE OF THE
SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR.**

No. 4093 /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. 176/E/PA, dated 30.07.2022; pertaining to departmental enquiry against ASI Asfandyar No. 4607.

STATEMENT OF ALLEGATION:

- 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(attached).

Enquiry officer provided reasonable opportunity to ASI Asfandyar. Statement of allegation was served upon him and his written reply was recorded and he was cross 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

24

STATEMENT OF ASI ASFANDYAR:

ASI ASFandyar was called to the office and his statement was recorded which is attached.

FINDINGS:

- i. That Lal Sher, Jan Sher, Ramzan etc are involved in land grabbing, extortion, killing of innocent people as well as killing of innocent women.
- ii. That they are also involved in the killing of police officers.
- iii. That they are involved in illegal activities since 20/25 years.
- iv. That entire family involved in criminal activities, (criminal record is attached).
- v. That there are many police officers who are their friends and supporters.
- vi. 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 their lawful duties.
- vii. That it is because of these police officers that they have been able to reach that much level of the criminality.
- viii. 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.
- ix. That ASI Asfandyar was posted in the PS Shahpur recently, he has three contacts with accused and notorious criminal Jan Sher (record attached).
- x. That he knew that Jan Sher is a notorious criminal and is involved in the above mentioned activities.
- xi. That told the EO that he was given threat by Jan Sher for not interfering in the affairs of their village.
- xii. That during the period in contact accused Jan Sher was PO, he should not have maintained contact with him as there is an outgoing call from under enquiry officer to Jan Sher for the reasons best known to him.
- xiii. That he was not in contact with Jan Sher in the last year except while he was posted to PS Shahpur on GD Duty.
- xiv. That no mala fide on the part of the ASI Asfandyar came to the surface.

CONCLUSION:

Keeping in view the above mentioned circumstances, ASI Asfandyar No. 4607 is "**found guilty of misconduct as per allegation number 4 of the charge sheet.**"

ATTESTED

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



25
OFFICE OF THE
SR: SUPERINTENDENT OF POLICE,
(OPERATIONS) PESHAWAR
Phone: 091-9210508

ORDER

This office order will dispose-off the departmental proceedings against ASI Asfandyar No. 4607 while posted at PS Shahpur was placed under suspension and proceeded against departmentally on the allegations/charges 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 and he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.

2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Rural was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement of ASI Asfandyar No. 4607, cross questioning, reports from intelligence sources and other available material the allegations No. 4 of the charge sheet stands proved.

3. On receipt of findings of the enquiry officer, he was called in Orderly Room and heard in person on 01.11.2022. The accused official during personal hearing could not defend himself against the charges leveled against him. Keeping in view of the above, the undersigned being a competent authority do agree with the recommendation of the enquiry officer, therefore, ASI Asfandyar No. 4607 is hereby awarded minor punishment of "Stoppage of increment for six months. He is reinstated into service from the date of suspension.

Order announced.

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

No. 2863-66 PA dated Peshawar, the 02/11/2022.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. EC-II, PO.
3. FMC along with complete enquiry file for record (9).

ATTESTED

4607
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اسی → سزجانشہ

Call Type	A	B	Date/Time	SECS	IMEI	Location of A
Call - Incoming	3139559939	3160242424	06/24/2022 18:34:10	112	354191109332520	Mohallah Ahmad Khel, Shewa, Swabi
Call - Incoming	3139559939	3160242424	06/24/2022 18:36:14	114	354191109332520	Khasra # 1664, Khata # 1960/3799, Mouza Sheikh Jana, Mohallah Ali Sher Khel, Sheikh Jana, Tehsil Razar & ?Dist. Swabi.
Call - Outgoing	3139559939	3160242424	06/25/2022 15:18:43	66	354191109332520	Mohallah Ahmad Khel, Shewa, Swabi

26

RECEIVED

27

**OFFICE OF THE
SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR.**

No. 4092/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. 182/E/PA, dated 30.07.2022; pertaining to departmental enquiry against ASI Sajawal Khan No. 4140.

STATEMENT OF ALLEGATION:

- 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
- 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 ASI Sajawal Khan. Statement of allegation was served upon him and his written reply was recorded and he was cross 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.

STATEMENT OF ASI SAJAWAL KHAN:

ASI Sajawal Khan was called to the office and his statement was recorded which is attached.

ATTESTED

c 28

KEY QUESTIONS:

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

Ans: - Yes

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: - Did you know 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, before my posting in PS Shahpur.

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

Ans: - Yes

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

Ans: - Failed to explain.

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 supports.
6. That they also harass police officers by using many techniques i.e submitting false application in courts and to superior officers just to stop them from performing their 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.

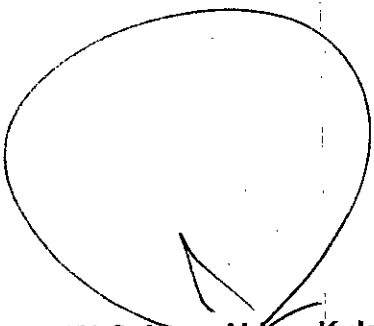
ATTESTED

29

- that he knew that the above mentioned group are wanted and is POs and have been POs all along as he confessed during cross questioning.
10. That he confessed that the above mentioned group is involved in land mafia, killing of innocent people as well as killing of police officials.
 11. That being a police officer it is necessary to avoid contacts with criminals and other people having illegal activities, but, ASI Sajawal Khan failed to do this.
 12. That as far as, being Nazim of area does not give any person a reason to justify crimes of a criminal.
 13. That he served in the PS Shahpur in both investigation and operation staff.
 14. That ASI Sajawal Khan was in contact with the above mentioned group since long before his posting in PS Shahpur.
 15. Nothing substantial could be found against him to substantiate the allegations from serial no.1 to serial no.3.
 16. That as a police officer, it was his duty to avoid contact with accused Jan Sher , knowing fully well his criminal history.
 17. That this officer has 15 contacts with the above mentioned group (incoming and outgoing both).

CONCLUSION:

In view of above, analyzing of the statement of ASI Sajawal Khan No. 4140, cross questioning, intelligence sources and other available material the "***allegation no.4 of the charge sheet stands proved***".



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

ATTESTED



مسترحان خان شير / سجاد دل نبي

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Call Type	A	B	Date/Time	SECS	IMEI	Location of A
Call - Outgoing	3146900767	3160242424	12/19/2021 12:56:19	153	355705608343800	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3146900767	3160242424	12/19/2021 17:19:35	51	355705608343800	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3146900767	3160242424	12/19/2021 17:40:28	48	355705608343800	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Outgoing	3146900767	3160242424	01/24/2022 14:18:43	39	354158112482140	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3146900767	3160242424	02/18/2022 12:45:57	71	354158112482140	Chamkani Phaatak, Peshawar
Call - Incoming	3146900767	3160242424	02/18/2022 13:54:30	16	354158112482140	Dilazak Rd, Muhammad Zai, Gulo Zai, Peshawar
Call - Incoming	3146900767	3160242424	02/18/2022 14:42:14	63	354158112482140	Village Vadpaga Mohallah Najoi, PSH
Call - Incoming	3146900767	3160242424	03/02/2022 09:27:13	71	354158112482140	Zaheer shah Afridi palaza, Shaheen town Laberty RD, near police station PSH
Call - Outgoing	3146900767	3160242424	04/30/2022 10:20:16	94	354158112482140	Wadpagga, Peshawar, KPK
Call - Incoming	3146900767	3160242424	04/30/2022 11:49:54	59	354158112482140	Wadpagga, Peshawar, KPK
Call - Incoming	3146900767	3160242424	04/30/2022 13:11:58	50	354158112482140	Sardar Garhi, Near GT Road, Peshawar
Call - Incoming	3146900767	3160242424	05/07/2022 19:52:21	30	354158112482140	Wadpagga, Peshawar, KPK
Call - Outgoing	3146900767	3160242424	05/07/2022 19:54:35	16	354158112482140	Wadpagga, Peshawar, KPK
Call - Incoming	3146900767	3160242424	05/09/2022 09:21:39	57	354158112482140	Village Kankala, Charsadda Rd., Peshawar
Call - Outgoing	3146900767	3160242424	06/05/2022 21:51:48	1	354158112482140	Wadpagga, Peshawar, KPK
Call - Outgoing	3146900767	3160242424	06/05/2022 21:52:24	181	354158112482140	Wadpagga, Peshawar, KPK
Call - Incoming	3146900767	3160242424	06/07/2022 11:39:15	53	354158112482140	PTCL Colony, Peshawar

ATTESTED



31
OFFICE OF THE
SR: SUPERINTENDENT OF POLICE,
(OPERATIONS) PESHAWAR
Phone. 091-9210508

ORDER

This office order will dispose-off the departmental proceedings against ASI Sajawal Khan No. 4140 while at CCP Peshawar was placed under suspension and proceeded against departmentally on the allegations/charges 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 and he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.

2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Rural was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement of ASI Sajawal Khan No. 4140, cross questioning, reports from intelligence sources and other available material the allegations No. 4 of the charge sheet stands proved.

3. On receipt of findings of the enquiry officer, he was called in Orderly Room and heard in person on 01.11.2022. The accused official during personal hearing could not defend himself against the charges leveled against him. Keeping in view of the above, the undersigned being a competent authority do agree with the recommendation of the enquiry officer, therefore, ASI Sajawal Khan No. 4140 is hereby awarded minor punishment of "Stoppage of increment for two years. He is reinstated into service from the date of suspension.

Order announced.

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

No. 2875-78 PA dated Peshawar, the 2/11 /2022.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. EC-II, PO, OASIS CRC
3. FMC along with complete enquiry file for record (30).

ATTESTED

- 32

**OFFICE OF THE
SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR.**

No. 4078/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. 171/E/PA, dated 30.07.2022; pertaining to departmental enquiry against FC Arif Ullah No. 2864.

STATEMENT OF ALLEGATION:

- 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 FC Arif Ullah No. 2864. Statement of allegation was served upon him and his written reply was recorded and he was cross 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

33

STATEMENT OF FC ARIF ULLAH NO. 2864:

FC Arif Ullah No. 2864 was called to the office and his statement was recorded which is attached.

CROSS QUESTIONS:

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

Ans: - Yes,

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

Ans: - He was killed by them without any reason.

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

Ans: - No answer.

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

Ans: - Silence (No answer).

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 their lawful duties.

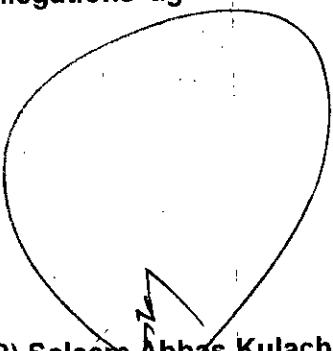
ATTESTED

34

7. That it is because of these police officers that they have been able to reach that much level of criminality.
8. That the testimony to the facts 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 at PS Daudzai a case was registered against Hussain Ullah brother of delinquent official vide FIR No. 1411 dated 21.12.2021 u/s 365 PPC. In which kidnappee returned back home. Later on, Ramzan did compromise between the parties and sorted out the matter. That's why he contacted him.
10. That the affidavit of the compromise was also checked who purchased on 22.12.2021 and wrote on 22.01.2022 (attached).
11. That this person has 6 contacts with accused Ramzan (incoming and outgoing).

CONCLUSION:

In view of above, analyzing of the statement of FC Arif Ullah, cross questioning, intelligence sources and other available material **"the allegations against him couldn't be proved."**



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

ATTESTED





35

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

ORDER

This office order will dispose-off the departmental proceedings against Constable Arif Ullah No. 2864 while at CCP Peshawar was placed under suspension and proceeded against departmentally on the allegations/charges 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 and he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.

2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Rural was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement of Constable Arif Ullah No. 2864, cross questioning, reports from intelligence sources and other available material the allegations against could not be proved.

3. On receipt of findings of the enquiry officer, he was called in Orderly Room and heard in person on 01.11.2022. The accused official during personal hearing defend himself against the charges leveled against him. Keeping in view of the above, the undersigned being a competent authority do agree with the recommendation of the enquiry officer, therefore, Constable Arif ullah No. 2864 is hereby exonerated from the allegation leveled against him. Hence the enquiry against him is hereby filed. He is reinstated into service from the date of suspension.

Order announced.

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

No. 2883-86 PA dated Peshawar, the 02/11 /2022.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. PO, OASI, CRC
3. PMC along with complete enquiry file for record (12).

ATTESTED

36

**OFFICE OF THE
SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR.**

No. 4074/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. 188/E/PA, dated 30.07.2022; pertaining to departmental enquiry against LHC Rashid Ali No. 1070.

STATEMENT OF ALLEGATION:

- 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 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 LHC Rashid Ali No. 1070. Statement of allegation was served upon him and his written reply was recorded and he was cross 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

STATEMENT OF LHC RASHID ALI NO. 1070:

LHC Rashid Ali No. 1070 was called to the office and his statement was recorded which is attached.

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 their lawful duties.
7. That it is because of these police officers that they have been able to reach that much level of criminality.
8. That the testimony to the facts 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 this person has 5 contacts with Jan Sher as he asked about some officials number and also threatened him of dire consequences.
10. No malafide or any other thing came on surface to substantiate the allegations leveled against him.

CONCLUSION:

In view of above, analyzing of the statement of LHC Rashid Ali No. 1070, cross questioning, intelligence sources and other available material "**he is not guilty**".

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

ATTESTED



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

37

ORDER

This office order will dispose-off the departmental proceedings against LHC Rashid Ali No. 1070 while at PS Daudzai was placed under suspension and proceeded against departmentally on the allegations/charges 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 and he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.

2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Rural was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement of LHC Rashid Ali No. 1070, cross questioning, reports from intelligence sources and other available material the allegations against could not be proved.

3. On receipt of findings of the enquiry officer, he was called in Orderly Room and heard in person on 01.11.2022. The accused official during personal hearing defend himself against the charges leveled against him. Keeping in view of the above, the undersigned being a competent authority do agree with the recommendation of the enquiry officer, therefore, LHC Rashid Ali No. 1070 is hereby exonerated from the allegation leveled against him. Hence the enquiry against him is hereby filed. He is reinstated into service from the date of suspension.

Order announced.

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

No. 2843-46 PA dated Peshawar, the 02/11/2022.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. PO, OASI, CRC
3. FMC along with complete enquiry file for record (8).

ATTESTED

C

38

**OFFICE OF THE
SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR.**

No. 4075/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. 180/E/PA, dated 30.07.2022; pertaining to departmental enquiry against ASI Muhammad Irshad No. 191.

STATEMENT OF ALLEGATION:

- 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 P.S 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 ASI Muhammad Irshad. Statement of allegation was served upon him and his written reply was recorded and he was cross 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

39

STATEMENT OF MUHAMMAD IRSHAD:

ASI Muhammad Irshad was called to the office and his statement was recorded which is attached.

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 the 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 their 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 ASI Irshad called to Doulat and Sartaj to give the outstanding amount of Rs. 50,000 to constable Ayaz as he is needs. In which Jan Sher contacted and CDR and FIR support the proposition.
10. That he was contacted by the accused Jan Sher twice and was threatened.

CONCLUSION:

In view of above, analyzing of the statement of ASI Muhammad Irshad No. 191, cross questioning, intelligence sources and other available material the allegations **against ASI Muhammad Irshad No. 191 couldn't be proved.**

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

ATTESTED



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

ORDER

This office order will dispose-off the departmental proceedings against ASI Muhammad Irshad No. 191 while as I/C Police Post PS Daudzai was placed under suspension and proceeded against departmentally on the allegations/charges 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 and he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.

2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Rural was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement of ASI Muhammad Irshad No. 191, cross questioning, reports from intelligence sources and other available material the allegations against could not be proved.

3. On receipt of findings of the enquiry officer, he was called in Orderly Room and heard in person on 01.11.2022. The accused official during personal hearing defend himself against the charges leveled against him. Keeping in view of the above, the undersigned being a competent authority do agree with the recommendation of the enquiry officer, therefore, ASI Muhammad Irshad No. 191 is hereby exonerated from the allegation leveled against him. Hence the enquiry against him is hereby filed. He is reinstated into service from the date of suspension.

Order announced.

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

No. 2867-70 PA dated Peshawar, the 02/11 /2022.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. EC-II, PO.
3. FMC along with complete enquiry file for record (//).

ATTESTED

41

**OFFICE OF THE
SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR.**

No. 4079/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. 181/E/PA, dated 30.07.2022; pertaining to departmental enquiry against FC Izhar No. 1959.

STATEMENT OF ALLEGATION:

- 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 FC Izhar No. 1959. Statement of allegation was served upon him and his written reply was recorded and he was cross 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

- 42

STATEMENT OF FC IZHAR NO. 1959:

FC Izhar No. 1959 was called to the office and his statement was recorded which is attached.

CROSS QUESTIONS:

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

Ans: - Yes.

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

Ans: - He was killed by them without any reason.

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

Ans: - No answer.

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

Ans: - My relative was missing at Afghanistan and Jan Sher has many friends there, on that's why he contacted to find out his relative through his friends at Afghanistan.

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.

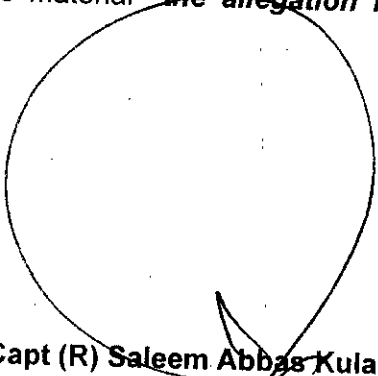
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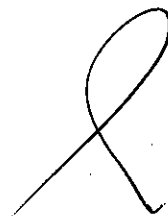
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6. That they also harass police officers by using many techniques i.e submitting false applications in courts and to superior officers just to stop them from performing their lawful duties.
7. That it is because of these police officers that they have been able to reach that much level of criminality.
8. That the testimony to the facts 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 this person has 4 contacts with Jan Sher as he has friends at Afghanistan and relative of FC Izhar was missing there. That's why he asked for help to trace out his relative who was doctor there.
10. That Doctor Bakhtiar who was missing from Afghanistan also heard and it is found that he was missing for 3,4 months at Afghanistan.

CONCLUSION:

In view of above, analyzing of the statement of FC Izhar Khan No. 1959, cross questioning, intelligence sources and other available material "***the allegation no. 4 of the charge sheet stands proved against him***".


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





44
OFFICE OF THE
SR: SUPERINTENDENT OF POLICE,
(OPERATIONS) PESHAWAR
Phone: 091-9210508

ORDER

This office order will dispose-off the departmental proceedings against Constable Izhar No. 1959 while posted at CCP Peshawar was placed under suspension and proceeded against departmentally on the allegations/charges 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 and he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.

2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Rural was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement of Constable Izhar No. 1959, cross questioning, reports from intelligence sources and other available material the allegations No. 4 of the charge sheet stands proved.

3. On receipt of findings of the enquiry officer, he was called in Orderly Room and heard in person on 01.11.2022. The accused official during personal hearing could not defend himself against the charges leveled against him. Keeping in view of the above, the undersigned being a competent authority do agree with the recommendation of the enquiry officer, therefore, Constable Izhar No. 1959 is hereby awarded minor punishment of "Stoppage of increment for six months. He is reinstated into service from the date of suspension.

Order announced.

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

No. 2831-34 PA dated Peshawar, the 02/11 2022.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. OASI, CRC, PO.
3. FMC along with complete enquiry file for record (//).

ATTESTED

45

**OFFICE OF THE
SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR.**

No. 4080/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. 177/E/PA, dated 30.07.2022; pertaining to departmental enquiry against Inspector Yousaf Jan.

STATEMENT OF ALLEGATION:

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 Janpur.
2. It is further alleged that he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.
3. He has tarnished the image of police department in the eyes of general public.
4. All this amounts to gross misconduct on his part and rendered him liable for punishment under Police (E&D) Rules, 1975.

PROCEEDINGS:

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

Enquiry officer provided reasonable opportunity to Inspector Yousaf Jan. Statement of allegation was served upon him and his written reply was recorded and he was cross 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 N 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.

STATEMENT OF INSPECTOR YOUSAF JAN:

Inspector Yousaf Jan was called to the office and his statement was recorded which is attached.

ATTESTED

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CROSS QUESTIONS:

Q: - Where do you live?

Ans: - Rajar, Charsadda.

Q: - Have ever performed duties at PS-Janpur?

Ans: - No.

Q: - Since when you are performing your duties in CCP?

Ans: - Since 1991.

Q: - Have you performed your duties in PS Chamkani?

Ans: - Yes, as SHO in 2018.

Q: - Reason of contact with Jan Sher and Lal Sher?

Ans: - Their cousins are wanted and are POs in different cases of PS Urmar. In which raids were conducted several times for the arrest of accused. That's why they contacted and threatened me to not to raid again.

Q: - Since when are you performing your duty at PS Urmar?

Ans: - Since 9 months.

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 their 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 Inspector Yousaf Jan conducted several raids for the arrest of POs who are wanted in different cases (FIRs attached). In which, Jan Sher and Lal Sher etc contacted and threatened to not to raid again.
10. That above mentioned POs in the jurisdiction of PS Urmer are close relatives of Lal Sher group.
11. That he did his job according to the law.
12. That this officer has 4 contacts with Jan Sher. Call details are as under: -
 1. 4 calls before the incident (incoming and outgoing both).

ATTESTED

47

CONCLUSION:

In view of above, analyzing of the statement of Inspector Yousaf Jan, cross examination, reports from intelligence sources and other available material; it is found that Inspector Yousaf Jan is not guilty of the offences as charged.

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

ATTESTED



48
OFFICE OF THE
SR: SUPERINTENDENT OF POLICE,
(OPERATIONS) PESHAWAR
Phone. 091-9210508

ORDER

This office order will dispose-off the departmental proceedings against Inspector Yousaf Jan No. P/324 while as SIO Police Station Umar was placed under suspension and proceeded against departmentally on the allegations/charges 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 Shalpur and he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.

2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Rural was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement of Inspector Yousaf Jan, cross questioning, reports from intelligence sources and other available material the allegations against could not be proved.

3. On receipt of findings of the enquiry officer, he was called in Orderly Room and heard in person on 01.11.2022. The accused official during personal hearing defend himself against the charges leveled against him. Keeping in view of the above, the undersigned being a competent authority do agree with the recommendation of the enquiry officer, therefore, Inspector Yousaf Jan No. P/324 is hereby exonerated from the allegation leveled against him. Hence the enquiry against him is hereby filed. He is reinstated into service from the date of suspension.

Order announced.

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

No. 2879-82 PA dated Peshawar, the 02/11 /2022.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. EC-II, PO
3. FMC along with complete enquiry file for record (25).

ATTESTED

OFFICE OF THE
SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR.

49

No. 4081/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. 179/E/PA, dated 30.07.2022; pertaining to departmental enquiry against HC Syed Waqar Ali Shah No. 1873.

STATEMENT OF ALLEGATION:

- 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 HC Waqar Ali Shah No. 1873. Statement of allegation was served upon him and his written reply was recorded and he was cross 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.

STATEMENT OF HC WAQAR ALI SHAH:

HC Waqar Ali Shah was called to the office and his statement was recorded which is attached.

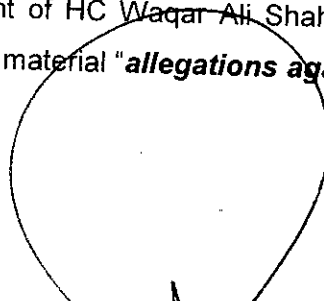
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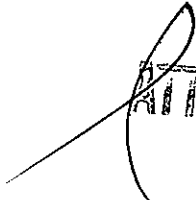
FINDINGS:

- 150
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 their 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 he received a call and caller stated that don't tease his villager during Nakabandi. In which, asked by delinquent official about his identity but he discontinued the call.
 10. That he was unaware regarding any Lal Sher, Jan Sher or any other member of his group as this period of duty was first in his tenure.
 11. That this officer has 8 contacts with Jan Sher (incoming and outgoing both).

CONCLUSION:

In view of above, analyzing of the statement of HC Waqar Ali Shah No. 1873, cross questioning, intelligence sources and other available material "**allegations against him are not proved**".


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


ATTESTED



51
OFFICE OF THE
SR: SUPERINTENDENT OF POLICE,
(OPERATIONS) PESHAWAR
Phone. 091-9210508

ORDER

This office order will dispose-off the departmental proceedings against HC Syed Waqar Ali Shah No. 1873 while at PS Hayatabad was placed under suspension and proceeded against departmentally on the allegations/charges 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 and he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.

2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Rural was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement of HC Syed Waqar Ali Shah, cross questioning, reports from intelligence sources and other available material the allegations against could not be proved.

3. On receipt of findings of the enquiry officer, he was called in Orderly Room and heard in person on 01.11.2022. The accused official during personal hearing defend himself against the charges leveled against him. Keeping in view of the above, the undersigned being a competent authority do agree with the recommendation of the enquiry officer, therefore, HC Syed Waqar Ali Shah No. 1873 is hereby exonerated from the allegation leveled against him. Hence the enquiry against him is hereby filed. He is reinstated into service from the date of suspension.

Order announced.

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

No. 2855-58 PA dated Peshawar, the 02/11/2022.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. PO, OASI, CRC
3. FMG along with complete enquiry file for record (35).

ATTESTED

52

**OFFICE OF THE
SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR.**

No. 4091 /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. 172/E/PA, dated 30.07.2022; pertaining to departmental enquiry against DFC Fakhr e Alam No. 419.

STATEMENT OF ALLEGATION:

- 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 DFC Fakhr e Alam No. 419. Statement of allegation was served upon him and his written reply was recorded and he was cross 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

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STATEMENT OF DFC FAKHR E ALAM:

DFC Fakhr e Alam was called to the office and his statement was recorded which is attached.

CROSS QUESTIONS:

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

Ans: - Yes.

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

Ans: - He was killed by them without any reason.

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

Ans: - No answer.

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

Ans: - Only for compliance the court orders and informing about the court summons.

FINDINGS:

- i. That Lal Sher, Jan Sher, Ramzan etc are involved in land grabbing, extortion, killing of innocent people as well as killing of innocent women.
- ii. That they are also involved in the killing of police officers.
- iii. That they are involved in illegal activities since 20,25 years.
- iv. That entire family involved in criminal activities, (criminal record is attached).
- v. That there are many police officers who are their friends and supporters.
- vi. 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 their lawful duties.

ATTESTED

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- vii. That it is because of these police officers that they have been able to reach that much level of criminality.
- viii. That the testimony to the facts 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.
- ix. That applicant of the case i.e Jan Sher and Ramzan called by DFC Fakhr e Alam and informed about the summons. The details of the cases are as under: -
 - a. FIR No. 56 dated 17.01.2018 u/s 302/34 PS Chamkani.
 - b. FIR No. 1214 dated 29.10.2014 u/s 302/324/34 PS Chamkani
 - c. FIR No. 2267 dated 06.10.2019 u/s 324 PS Chamkani
 - d. FIR No. 407 dated 03.04.2021 u/s 302 PS Chamkani
- x. All relevant documents i.e court summons, cases details etc are attached.
- xi. That this officer has 39 contacts with Jan Sher and Ramzan (incoming and outgoing both).

CONCLUSION:

In view of above, analyzing of the statement of DFC Fakhr e Alam No. 419, cross questioning, intelligence sources and other available material **the allegations are not proved.**

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

ATTESTED



55
OFFICE OF THE
SR: SUPERINTENDENT OF POLICE,
(OPERATIONS) PESHAWAR
Phone. 091-9210508

ORDER

This office order will dispose-off the departmental proceedings against Constable Fakhr-e-Alam No. 419 while at PS Chamkani was placed under suspension and proceeded against departmentally on the allegations/charges 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 and he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.

2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Rural was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement of Constable Fakhr-e-Alam No. 419, cross questioning, reports from intelligence sources and other available material the allegations against could not be proved.

3. On receipt of findings of the enquiry officer, he was called in Orderly Room and heard in person on 01.11.2022. The accused official during personal hearing defend himself against the charges leveled against him. Keeping in view of the above, the undersigned being a competent authority do agree with the recommendation of the enquiry officer, therefore, Constable Fakhr-e-Alam No. 419 is hereby exonerated from the allegation leveled against him. Hence the enquiry against him is hereby filed. He is reinstated into service from the date of suspension.

Order announced.

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

No. 2835-38 PA dated Peshawar, the 02/11/2022.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. PO, OASI, CRC
3. FMC along with complete enquiry file for record (12).

ATTESTED

OFFICE OF THE
SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR.

No. 4089 /PA: dated Peshawar the 28/10 /2022.

56

To

The Senior Superintendent of Police,
Operations, Peshawar.

Subject:

DEPARTMENTAL ENQUIRY

Please refer to your office Endt. No. 185/E/PA, dated 30.07.2022; pertaining to departmental enquiry against FC Shoukat Khan No. 1190.

STATEMENT OF ALLEGATION:

- 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 FC Shoukat Khan No. 1190. Statement of allegation was served upon him and his written reply was recorded and he was cross 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.

STATEMENT OF FC SHOUKAT KHAN:

FC Shoukat Khan was called to the office and his statement was recorded which is attached.

ATTESTED

CROSS QUESTIONS:

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

Ans: - Yes.

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

Ans: - He was killed by them without any reason.

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

Ans: - No answer.

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

Ans: - Because for asking the presence of PMA.

FINDINGS:

- ⇒ That Lal Sher, Jan Sher, Ramzan etc are involved in land grabbing, extortion, killing of innocent people as well as killing of innocent women.
- ⇒ That they are also involved in the killing of police officers.
- ⇒ That they are involved in illegal activities since 20,25 years.
- ⇒ That entire family involved in criminal activities, (criminal record is attached).
- ⇒ That there are many police officers who are their friends and supporters.
- ⇒ 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 their lawful duties.
- ⇒ That it is because of these police officers that they have been able to reach the much level of criminality.
- ⇒ That the testimony to the facts 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.
- ⇒ That he performed his duties as gunner MPA Jehandad and on his directions he called to Jan Sher, Lal Sher etc for meeting or other work as he was area Nazim.

ATTACHED

- SE
- ⇒ That Lal Sher is Nazim of his constituency and was contacted several time by MPA and his son namely Arbab Imad.
 - ⇒ That whenever, MPA is in meeting or busy and unable to receive the call, different persons, Nazimeen, elders of the area as well as Lal Sher was calling on his number.
 - ⇒ That this person has 3 contacts with Jan Sher.

CONCLUSION:

In view of above, analyzing of the statement of FC Shoukat Khan, cross questioning, intelligence sources and other available material "***the allegations against FC Shoukat Khan couldn't be proved***".

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

ATTESTED



59
OFFICE OF THE
SR: SUPERINTENDENT OF POLICE,
(OPERATIONS) PESHAWAR
Phone. 091-9210508

ORDER

This office order will dispose-off the departmental proceedings against Constable Shoukat Khan No. 1190 while at CCP Peshawar was placed under suspension and proceeded against departmentally on the allegations/charges 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 and he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.

2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Rural was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement of Constable Shoukat Khan No. 1190, cross questioning, reports from intelligence sources and other available material the allegations against could not be proved.

3. On receipt of findings of the enquiry officer, he was called in Orderly Room and heard in person on 01.11.2022. The accused official during personal hearing defend himself against the charges leveled against him. Keeping in view of the above, the undersigned being a competent authority do agree with the recommendation of the enquiry officer, therefore, Constable Shoukat Khan No. 1190 is hereby exonerated from the allegation leveled against him. Hence the enquiry against him is hereby filed. He is reinstated into service from the date of suspension.

Order announced.

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

No. 2821-30 PA dated Peshawar, the 02 / 11 / 2022.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. PO, OASI, CRC
3. EMC along with complete enquiry file for record (//).

ATTESTED

60

**OFFICE OF THE
SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR.**

No. 4087/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. 174/E/PA, dated 30.07.2022; pertaining to departmental enquiry against HC Amjid Khan No. 5564.

STATEMENT OF ALLEGATION:

- 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 HC Amjid Khan No. 5564. Statement of allegation was served upon him and his written reply was recorded and he was cross 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 Hajji Ihsan Ullah.

ATTESTED

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STATEMENT OF HC AMJID KHAN NO. 5564:

HC Amjid Khan No. 5564 was called to the office and his statement was recorded which is attached.

CROSS QUESTIONS:

Q: - Why you have attached the press clipping of martyred ASI Amjid Khan with your statement ?

Ans: - "دل کو سکون کے لیے"

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

Ans: - Yes.

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

Ans: - He was killed by them without any reason.

Q: - Did you know 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: - No.

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

Ans: - Yes

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

Ans: - No answer.

TESTED

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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 the police officials by using many techniques i.e lodging false applications in courts and to superior officers just to stop them from performing their lawful duties.
7. That it is because of those 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 he knew that the above mentioned group are wanted and is POs and have been POs all along as he confessed during cross questioning.
10. That he confessed that the above mentioned group is involved in land mafia, killing of innocent people as well as killing of police officials.
11. That during cross questioning, he denied the relationship and contact with the above mentioned group but in his CDR cleared showed that he in contact with the group (CDR attached).
12. That being a police officer it is necessary to avoid contacts with criminals and other people having illegal activities, but, HC Amjid Khan failed to do this.
13. That as far as, being Nazim of area does not give any person a reason to justify crimes of a criminal.
14. That he mentioned in his statement that the person who has been charged is not him and he has no contacts with the Lal Sher Group contrary to what is reflected in his CDR.
15. That he is the resident of the same village as of the accused.
16. That knowing fully well the history of the group he has been involved
17. That this officer has 7 contacts with Jan Sher, Lal sher and Ramzan (incoming and outgoing both).

CONCLUSION:

In view of above, analyzing of the statement of Inspector HC Amjid No. 5564, cross questioning, intelligence sources and other available material the **allegation no.4 of charge sheet against him is proved.**

ATTESTED

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



63

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

ORDER

This office order will dispose-off the departmental proceedings against HC Amjid Khan No. 5564 while posted at CCP Peshawar was placed under suspension and proceeded against departmentally on the allegations/charges 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 and he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.

2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Rural was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement of HC Amjid Khan No. 5564, cross questioning, reports from intelligence sources and other available material the allegations No. 4 of the charge sheet stands proved.

3. On receipt of findings of the enquiry officer, he was called in Orderly Room and heard in person on 01.11.2022. The accused official during personal hearing could not defend himself against the charges leveled against him. Keeping in view of the above, the undersigned being a competent authority do agree with the recommendation of the enquiry officer, therefore, HC Amjid Khan No. 5564 is hereby awarded minor punishment of "Stoppage of increment for six months. He is reinstated into service from the date of suspension.

Order announced.

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

No. 2847-50 PA dated Peshawar, the 02/11 /2022.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. EC-II, PO.
3. FMC along with complete enquiry file for record (/ 3).

ATTESTED

64

**OFFICE OF THE
SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR.**

No. 4084/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. 178/E/PA, dated 30.07.2022; pertaining to departmental enquiry against IHC Irfan Ullah No. 2988.

STATEMENT OF ALLEGATION:

- 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 IHC Irfan Ullah No. 2988. Statement of allegation was served upon him and his written reply was recorded and he was cross 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

- 65

STATEMENT OF IHC IRFAN ULLAH NO. 2988:

IHC Irfan Ullah No. 2988 was called to the office and his statement was recorded which is attached.

CROSS QUESTIONS:

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

Ans: - Yes.

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

Ans: - He was killed by them without any reason.

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

Ans: - Yes

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

Ans: - for same FIR

Q: - Why you have been in contact with Jan Sher, Lal Sher, Ramzan etc since 6 months.

Ans: - as I already stated.

ATTESTED

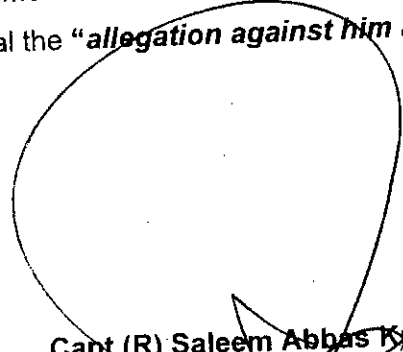
FINDINGS:

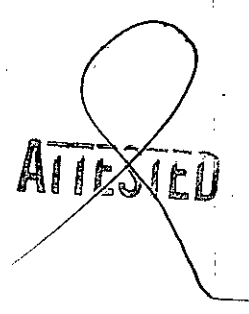
1. That Lal Sher, Jan Sher, Ramzan etc are involved in land grabbing, extortion, killing of innocent people as well as killing of innocent women.
 2. That they are also involved in the killing of police officers.
 3. That they are involved in illegal activities since 20,25 years.
 4. That entire family involved in criminal activities, (criminal record is attached).
- many police officers who are their friends and supporters.

- 6. That they also harass police officers by using many techniques i.e submitting false application in courts and superior officers just to stop them from performing their lawful duties.
- 7. That it is because of these police officers that they have been able to the 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 he knew that the above mentioned group is wanted, are POs and have been POs all along as he confessed during cross questioning.
- 10. That he confessed that the above mentioned group is involved in land mafia, killing of innocent people as well as killing of police officials.
- 11. That he was in contact with the above mentioned group.
- 12. That during cross questioning he regretted the relationship with group but later on confessed that he has close relation with the group.
- 13. That being a police officer it is necessary to avoid contacts with criminals and other people having illegal activities, but, IHC Irfan Ullah failed to do this.
- 14. That this officer has 7 contacts with Jan Sher (incoming and outgoing both).
- 15. That he only contacted for the purpose of the FIR mentioned above of PS East Cantt.
- 16. That he was Muharir Investigation in PS East Cantt.
- 17. That his contacts are only at the day of the FIR as attached.

CONCLUSION:

In view of above, analyzing of the statement of Irfan Ullah No. 2988, cross questioning, intelligence sources and other available material the **"allegation against him are not proved"**.


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


ATTESTED



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

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ORDER

This office order will dispose-off the departmental proceedings against IIC Irfan Ullah No. 2988 while as Moharrar Investigation PS East Cantt was placed under suspension and proceeded against departmentally on the allegations/charges 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 and he has leaked secret information in arrest of POs in above mentioned FIR and allied with criminals.

2. Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation was issued against him and SP Rural was appointed as Enquiry Officer who submitted his finding wherein he concluded that statement of IIC Irfan Ullah, cross questioning, reports from intelligence sources and other available material the allegations against could not be proved.

3. On receipt of findings of the enquiry officer, he was called in Orderly Room and heard in person on 01.11.2022. The accused official during personal hearing defend himself against the charges leveled against him. Keeping in view of the above, the undersigned being a competent authority do agree with the recommendation of the enquiry officer, therefore, IIC Irfan Ullah No. 2988 is hereby exonerated from the allegation leveled against him. Hence the enquiry against him is hereby filed. He is reinstated into service from the date of suspension.

Order announced.

(L/Cdr @ KASHIF AFTAB AHMAD ABBAS)PSP
Senior Superintendent of Police
(Operations) Peshawar

No. 2823-26 PA dated Peshawar, the 02/11/2022.

Copy for information and necessary action to:-

1. The Capital City Police Officer, Peshawar.
2. EC-II, PO, OASI
3. EMC along with complete enquiry file for record (/ 0).

ATTESTED