

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.583 /2023.


Ex-IHC Muhammad Ilyas No. 102 of CCP Peshawar..... **Appellant.**

VERSUS

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

I n d e x

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

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

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Ex-IHC Muhammad Ilyas No. 102 of CCP Peshawar..... **Appellant.**

VERSUS

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

REPLY BY RESPONDENTS NO. 1, 2& 3.

Respectfully Sheweth:-

Khyber Pakhtunkhwa
Service Tribunal
Case No. 7730
dated 21/09/23

PRELIMINARY OBJECTIONS:-

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

REPLY ON FACTS:-

1. Incorrect. The appellant was appointed as constable in the year 2001 in the respondent department. He has not a clean service record and contains 19 bad entries and 01 Minor punishment on different occasions in his service. (Copy of list as annexure A)
2. Incorrect. The performance of the appellant during service was neither satisfactory nor up to the mark and his involvement in corrupt practice speaks volume of his inefficiency. Furthermore, the august Apex court held in number of dicta that accepting illegal gratification is a heinous offence for a civil servant who is found guilty of the offence, cannot be retained in the civil service.
3. Incorrect. The appellant along with two other officials were placed under suspension and issued them charge sheet with statement of allegations. Proper departmental enquiry was conducted against him, wherein the allegations leveled against the appellant were proved beyond any shadow of doubt. The appellant committed a gross misconduct by involving himself in contacts with smugglers and criminals which has defamed the image of police department in the eyes of general public, hence after fulfilling all codal formalities he was awarded major punishment of dismissal from service under Police Rules 1975 amended 2014.(copy of charge sheet, statement of allegations and enquiry report are annexure as B,C,D)
4. Incorrect. The appellant while posted as I/C Arbab Tapu was found involved in objectionable activities related to gravest misconduct of having nexus with anti-social, smugglers and criminal elements and was receiving illegal gratification/ bribe from them. The appellant has a persistent reputation of being corrupt and has maintained a standard of living beyond his known sources of income. In this regard, to dig out the real facts a regular inquiry was conducted, wherein the charges were proved and thereafter he was issued a final show cause

notice, which he received and replied, but his reply was found unsatisfactory, hence after fulfilling all the codal formalities he was awarded the major punishment of dismissal from service.(copy of FSCN is annexure as E)

5. Incorrect. The appellant filed departmental appeal, which was properly processed and also heard him in person by the appellate authority, however he failed to defend himself with plausible/justifiable grounds, hence appeal of the appellant was rejected/ filed having no legal footing. The appellant then preferred revision petition before the Revision Board, which after due consideration was also filed/rejected because the charges leveled against him were proved beyond any shadow of doubt.(copy of rejection orders are annexure as F,G)
6. Incorrect as explained in the preceding paras. Furthermore, the duty of police is to protect life, property and liberty of citizens, preserve and promote public peace but he despite being a member of disciplined force deviated himself from his lawful duty and indulged himself in illegal activities, hence he was awarded major punishment.
7. Incorrect. The appellant being a member of a disciplined force committed gross misconduct by involving himself in a heinous offence of getting gratification/bribe. The charges leveled against him were stand proved, hence his appeal was rejected/filed. Moreover, appeal of the appellant being devoid of merits and limitation may be dismissed on the following grounds.

REPLY ON GROUNDS:-

- A. Para is totally incorrect and misleading as the appellant was issued charge sheet with statement of allegations due to involvement in the above mentioned allegations. Detailed departmental proceeding was conducted against him under Rules ibid. Proper opportunity of defense was provided to the appellant but he failed to defend himself. Before imposing major punishment on the appellant, he was issued final show cause notice to which his reply was found unsatisfactory.
- B. Incorrect as explained above.
- C. Incorrect. Detailed departmental enquiry was conducted against him in accordance with law/rules. Enquiry officer after detailed probe into the matter reported that the charges against the appellant were proved. The appellant was provided full opportunity of defense to prove himself innocent, but he failed to prove himself innocent, hence he was rightly awarded the major punishment.
- D. Incorrect. Incorrect and based on misleading. Infact the appellant failed to rebut the charges during the course of enquiry and the inquiry officer conducted thorough probe into the matter and found the appellant guilty of the charges.
- E. Incorrect. The appellant availed the opportunity of hearing however, he failed to advance any plausible explanation in his defense.
- F. Incorrect. Involvement in getting illegal gratification and contacting with smugglers is a heinous offence and being a member of disciplined force he was liable to be proceeded departmentally hence after proof of charge, he was awarded penalty commensurate with his guilt/misconduct. Furthermore, the appellant himself is responsible for the situation by committing gross misconduct.

(3)

G. Respondents also seek permission of this Hon'ble Tribunal to raise additional grounds at the time of arguments.

PRAYERS:-

It is therefore most humbly prayed that in light of above facts and submissions, the appeal of the appellant being devoid of merit and legal footing, may kindly be dismissed with cost please.

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

**Capital City Police Officer,
Peshawar.**

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

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.583 /2023.

Ex-IHC Muhammad Ilyas No. 102 of CCP Peshawar..... Appellant.

VERSUS

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

AFFIDAVIT

We respondents No. 1 ,2 & 3 do hereby solemnly affirm and declare that the contents of the written reply are true and correct to the best of our knowledge and belief and nothing has concealed/kept secret from this Hon'ble Tribunal. It is further stated on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defense have been struck off.

Senior Superintendent of Police,
Operations, Peshawar.

Capital City Police Officer,
Peshawar.



Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

20 SEP 2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.583 /2023.

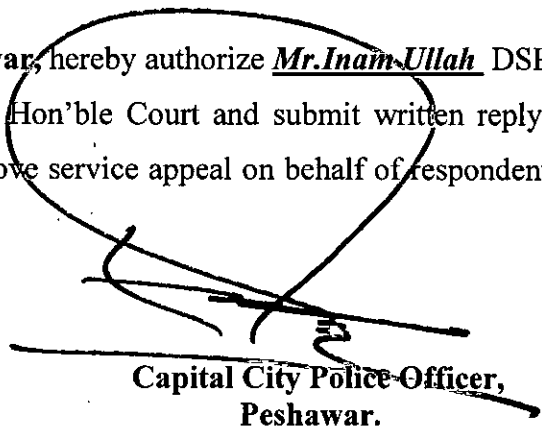
Ex-IHC Muhammad Ilyas No. 102 of CCP Peshawar..... **Appellant.**

VERSUS

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

AUTHORITY.

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




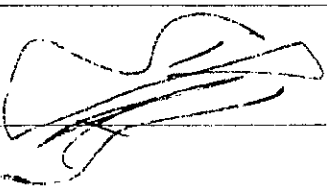
Capital City Police Officer,
Peshawar.

BIO DATA OF MUHAMMAD ILYAS S/O HASHIM KHAN FOR APPEARING IN THE ORDERLY ROOM

Name/No Ex- IHC Muhammad Ilyas No. 102	Home Address Peshawar	Date of Enlistment 16.10.2001	Charges	E.O Name/Recom: SP/Saddar Allegations proved to the extent of contacts.	Punishment Dismissal from Service By SSP/Ops: Peshawar Vide order No. 3022-25/PA Dt: 16.11.2022 (Appeal on time)	Plea of the Applicant Request to set-aside the punishment	Remarks/ Opinion of DSP/Legal Perusal of relevant record reveals that punishment awarded by the competent authority is in accordance with law.	Order of the CCPO								
									<p>Shorts facts leading to the instant appeal are that the defaulter IHC while posted as I/C Arbab Tapu PS Mattani Peshawar was proceeded against departmentally on the following charges:-</p> <ol style="list-style-type: none"> 1. He was found taking undue advantage of his assigned duty. The fact was evident that he was getting bribe from different smugglers of the area and developed contacts with anti social and criminal's elements. 2. Being hands in gloves with smugglers, he was brought bad name to police in general and Arbab Tapu Police in particulars. 3. He has a persistent reputation of being corrupt and has maintained a standard of living beyond his known source of income. 							
Total Qlty: Service		21 years, 01 month & 14 days.	<p>Entries:-</p> <table border="1"> <tr> <td>Bad</td> <td>Minor</td> <td>Major</td> <td>Good</td> </tr> <tr> <td>19</td> <td>01</td> <td>Nil</td> <td>Nil</td> </tr> </table>	Bad	Minor	Major	Good	19	01	Nil	Nil	D.O.B 01.02.1978		Education 10 th		<p>Lower inter: 19</p>
Bad	Minor	Major		Good												
19	01	Nil		Nil												
Courses		Bad		Minor	Major	Good										
Lower inter:		19	01	Nil	Nil											

(A)

Attested


Appeal
Filed

25/11/22

CHARGE SHEET

(B)

4
1

1. Whereas I, Haroon Rashid Khan PSP, SSP/Operations Peshawar, am satisfied that a Formal Enquiry as contemplated by Police Rules 1975 is necessary & expedient in the subject case against **ASI Ilyas Khan No. 102 I/C PP Arbab Tapu District Peshawar.**

2. And whereas, I am of the view that the allegations if established would call for major/minor penalty, as defined in Rule 3 of the aforesaid Rules.

3. Now therefore, as required by Rule 6 (1) (a) & (b) of the said Rules, **I, Haroon Rashid Khan PSP, SSP Operations, Peshawar hereby charge ASI Ilyas Khan No. 102 I/C PP Arbab Tapu District Peshawar under Rule 5 (4) of the Police Rules 1975.**

i) It has been observed that you were found taking undue advantage of your assigned duty. The fact is evident that you are getting bribe from different smugglers of the area and have developed contacts with anti-social and criminal elements and was receiving illegal gratification from them.

NO. 1928 /PA
Dt. 23-05-2022
Superintendent of Police
Saddar Div. Peshawar

ii) Being hand in glove with smugglers as well as criminal elements you have brought bad name to Police in general and Arbab Tapu Police in particular.

iii) That you have a persistent reputation of being corrupt and have maintained a standard of living beyond your known sources of income.

iv) All this comes within the purview of 'corruption' under Police (E&D) Rules, 1975.

4. I hereby direct you further under Rule 6 (1) (b) of the said Rules to put forth written defence within 7 days of the receipt of this Charge Sheet to the Enquiry Officer, as to why action should not be taken against you and also stating at the same time whether you desire to be heard in person.

5. In case your reply is not received within the specific period to the Enquiry Officer, it shall be presumed that you have no defence to offer and ex-parte action will be taken against you.

HAROON RASHID KHAN (T.ST PSP)
Senior Superintendent of Police
(Operations) Peshawar

Aff. Control
2022

PA
Serve charge sheet

SP/Saddar

25/5/22

STATEMENT OF ALLEGATIONS

(C)

5

1. I, Haroon Rashid Khan PSP, SSP/Operations Peshawar as competent authority, am of the opinion that **ASI Ilyas Khan No. 102 I/C PP Arbab Tapu District Peshawar** has rendered himself liable to be proceeded against departmentally as he has committed the following acts/omission within the meaning of section 03 of the Khyber Pakhtunkhwa Police Rules, 1975.

- i) It has been observed that he was found taking undue advantage of his assigned duty. The fact is evident that he is getting bribe from different smugglers of the area and have developed contacts with anti-social and criminal elements and was receiving illegal gratification from them.
- ii) Being hand in glove with smugglers as well as criminal elements you have brought bad name to Police in general and Arbab Tapu Police in particular.
- iii) That he has a persistent reputation of being corrupt and have maintained a standard of living beyond his known sources of income.
- iv) All this comes within the purview of 'corruption' under Police (E&D) Rules, 1975.

2. For the purpose of scrutinizing the conduct of afore said police official in the said episode with reference to the above allegations SP Sadder is appointed as Enquiry Officer under Rule 5 (4) of Police Rules 1975.

3. The Enquiry Officer shall in-accordance with the provision of the Police Rules (1975), provide reasonable opportunity of hearing to the accused Official and make recommendations as to punish or other action to be taken against the accused official.




HAROON RASHID KHAN (T.ST PSP)
Senior Superintendent of Police
(Operations) Peshawar

No. 63 E/PA, dated Peshawar the 18/05/2022

Copy to:-

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

Attested


OFFICE OF THE
SUPERINTENDENT OF POLICE,
SADDAR, CCP, PESHAWAR

NO. 1928 /PA

DATE: 27/07/2022

The Senior Superintendent of Police
Operations Peshawar.

DEPARTMENTAL INQUIRY AGAINST ASI MUHAMMAD ILYAS KHAN No. 102/ I/C
PP ARBAB TAPU.

Ref: Dy No. 63/E/PA-SSP (Ops) dated 18.05.2022.

Charge sheet contained on following words.

Brief Facts.

- i. It has been observed that you were found taking undue advantage of his assigned duty. The fact is evident that he is getting bribe from different smugglers of the area and have developed contacts with anti- social and criminal elements and was receiving illegal gratification from them.
- ii. Being hand in glove with smugglers as well as criminal elements you have brought bad name to Police in general and Arbab Tapu Police in particular.
- iii. The he has a persistent reputation of being corrupt and have maintained a standard of living beyond his known sources of income.

Proceedings.

To probe into the matter, the following officials summoned, heard in person, they submitted their written statements. which are annexed.

1. ASI Muhammad Ilyas Khan No. 102.
2. SI Imran Ullah SHO PS Mattani

Statement of ASI ILYAS.

He replied as mentioned below:-

بجو الہ موصولہ جارج شیٹ نمبر 1928/PA مورخہ 23.05.2022 مجاریہ جناب SSP صاحب آپریشن پشاور معروض ہوں کہ من ASI کا تبادلہ 14.02.2022 کو پولیس سٹیشن بھانہ ماڑی سے ارباب ٹاپو چیک پوسٹ تھانہ متی ہو کر مورخہ 16.02.2022 مد 34 تھانہ متی آمد کر کے ارباب ٹاپو چیک پوسٹ میں ڈیوٹی سرانجام دینے لگا۔ مورخہ 17.03.2022 کو بحوالہ مد 16 بحکم افسران بالا ارباب ٹاپو چیک پوسٹ سے چوکی جانے نو (2) تھانہ متی میں ڈیوٹی کیلئے تعینات کیا گیا۔ پھر مورخہ 19.03.2022 کو بحوالہ مد نمبر 8 یعنی دو دن بعد بحکم افسران بالا چوکی سرہ خاورہ تھانہ متی میں حاضری کی۔

رہنما

تقریباً ایک ہفتہ بعد جاوید خان SI کا چوکی سرہ خاورہ تھانہ مٹی میں آرڈر ہونے پر من ASI تھانہ مٹی میں حاضری کی۔ ٹھیک مورخہ 07.04.2022 کو بحوالہ نمبر 9 بحکم افسران بالا دوبارہ چوکی سرہ خاورہ تھانہ مٹی میں بحیثیت انچارج تعینات کیا گیا۔

من ASI نے ارباب ٹاپوچیک پوسٹ میں ٹوٹل 30 دن گزارے ہیں جس میں دہشت گردوں کے تریس کی وجہ سے من ASI کے ساتھ آرمی و ایف سی کی نفری بھی تعینات تھیں۔ اتنے قلیل عرصہ میں اور دوسرے فورسز کی موجودگی میں من ASI کیسے سمگلرز اور کریمینلز کے ساتھ مل سکتا ہے اور اگر من ASI ان سمگلروں اور کریمینلز لوگوں سے ملا بھی تھا تو دیگر فورسز خاص کر پولیس کے موبائل و دیگر چیک پوسٹ اور ناکہ بندیاں و پولیس افسران کیا ڈیوٹی سرانجام دے رہے تھے۔ یہ سراسر جھوٹ پر مبنی الزام ہے جس میں کوئی صداقت یا حقیقت نہیں ہے۔ من ASI کلئیر اس الزام کو مسترد کرتا ہوں۔ سائل نے کسی قسم کی کوئی کرپشن نہیں کی ہے اور نہ کوئی رشوت کی ہے۔ صرف اپنی ڈیوٹی نہایت ایمانداری کیساتھ سرانجام دی ہے۔

من ASI ایک خاندانی پولیس افسر ہے جس کی وجہ سے من ASI کو گھر سے پورا سپورٹ حاصل ہے جس کی وجہ سے من ASI کی طرز زندگی قدرے آسانی سے گزر رہی ہے اس لئے من ASI کو کوئی ضرورت نہیں ہے کہ اس قسم کی غلط یا ناجائز طریقوں سے اپنے آپ کو یا اپنے خاندان کو بدنام کریں من ASI پر جتنے بھی الزامات لگائے ہیں سب کے سب بہتان اور جھوٹے من گھڑت اور بے بنیاد ہے جس کی وجہ سے کوئی ثبوت نہیں ہے اور نہ اس قسم کی غلط اور غیر قانونی سرگرمیوں میں ملوث رہا ہوں۔ من ASI کا سابقہ سروس ریکارڈ بطور ثبوت موجود ہے۔

لہذا استدعا ہے کہ من ASI کو ان جھوٹے الزامات سے چھٹکارا دیا جائے۔ جارح شیٹ انکو آڑی کو فائل کرنے کی احکام صادر فرمائے

جاوے۔

Statement of SI Imran Ullah SHO PS Mattani.

بحوالہ انکو آڑی معروض خدمت ہوں کہ میری بد دوران SHO مٹی تعیناتی کے دوران مورخہ 16.02.2022 کو الیاس خان ASI بھانہ ماڑی سے انچارج ارباب ٹاپوچیک پوسٹ تبدیل ہو کر حاضری کی جو مورخہ 17.03.2022 کو حسب الحکم جناب DSP صاحب بڈھ بیر سرکل مذکورہ الیاس خان ASI ارباب ٹاپوچیک پوسٹ سے کلوز کیا گیا۔ دوران تعیناتی من SHO نے اسے ہمہ وقت ڈیوٹی پر موجود اور چوکس پایا۔ مجھے الیاس خان ASI کے ایک ماہ دوران تعیناتی کے کوئی شکایت نہیں ملی اور نہ کسی نے کسپلیٹ کی ہے کہ ہم سے اس نے کوئی رشوت یا دیگر ناجائز ڈیمانڈ کی ہے۔ دوران تعیناتی الیاس ASI اپنی ڈیوٹی نہایت ایمانداری سے سرانجام دی ہے۔ یہی میرا بیان ہے جو کہ حقیقت پر مبنی ہے۔

Accepted

E.O

Statements.

Statements of the following persons are attached.

- i. ASI Shahid Khan
- ii. FC Asghar Khan

SUSPENSION.

ASI Muhammad Ilyas Khan No.102 was suspended vide OB No. 1497-1504/PA dated 10.05.2022.

FINDINGS.

As per statements, the allegations partially proved to the extent of contacts, however ASI Muhammad Ilyas -102 having mobile Cell Phone No. 0301-8934520 had contacts with Ansar Ali (0333-9143946), who is smuggler as per source information and ASI Muhammad Ilyas had made contacts/calls to him for 19 times, summary of contacts attached please.

(Encl: 30 Pages)

(Aqeeq Hussain)
Superintendent of Police,
Sadder Division, CCP Peshawar.

Attested
Aqeeq

Handwritten signature or stamp at the bottom of the page.



(E)

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

No. 2822 /PA

Dated Peshawar the 02/11, 2022

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

1. I, Senior Superintendent of Police, Operations, Peshawar as competent authority, under the Police disciplinary Rules 1975, do hereby serve you ASI Muhammad Ilyas No. 102 as follows:-
2. (i) That consequent upon the completion of enquiry committee conducted against you by SP Saddar Peshawar, who found you guilty of the charges for which you were given the opportunity of personal hearing.
(ii) Ongoing through the findings and recommendations of the inquiry officer, the material on record and other connected papers including your defense before the said officers;
I am satisfied that you have committed the follow misconducts:

You have been **found guilty** of the charges already communicated to you vide this office bearing No. 63/PA dated 18.05.2022.

3. As a result thereof I, as Competent Authority decided to impose upon you major/minor penalty including dismissal from service under the said Rules.
4. You are, therefore, require to Show Cause as to why the aforesaid penalty should not be imposed upon you.
5. If no reply to this notice is received within 7-days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.
6. You are at liberty to be heard, in person, if so wished.

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

Attested
[Signature]

[Signature]
4-11-022





(F)

OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR

ORDER.

This order will dispose of the departmental appeal preferred by Ex-IIC Muhammad Hyas No. 102, who was awarded the major punishment of "Dismissal from service" under KP PR-1975 by SSP/Operations Peshawar vide order No. 3022-25/PA, dated 16.11.2022.

2- Short facts leading to the instant appeal are that the defaulter IIC while posted as I/C PP Arbab Tapu, Police Station Mattani Peshawar was proceeded against departmentally on the following charges:-

- i. He was found taking undue advantage of his assigned duty. The fact was evident that he was getting bribe from different smugglers of the area and developed contacts with anti social and criminal's elements.
- ii. Being hands in gloves with smugglers, he brought bad name to police in general and Arbab Tapu Police in particulars.
- iii. He has a persistent reputation of being corrupt and has maintained a standard of living beyond his known source of income.

3- He was issued proper Charge Sheet and Summary of Allegations by SSP/Operations Peshawar. The SP/Saddar Peshawar was appointed as inquiry officer to scrutinize the conduct of the accused official. The inquiry officer after conducting proper inquiry submitted his findings in which the allegations were partially proved to the extent of contacts. The competent authority in light of the findings of the enquiry officer issued him Final Show Cause Notice to which he replied but the same was found unsatisfactory, hence awarded the above major punishment.

4- He was heard in person in O.R and the relevant record along with his explanation perused. During personal hearing the appellant failed to submit any plausible explanation in his defence. He was given ample opportunity to prove his innocence but he could not defend himself. Moreover, his previous service record also carries 19 bad entries. Therefore, his appeal for setting aside the punishment awarded to him by SSP/Operations Peshawar is hereby **rejected/filed**.

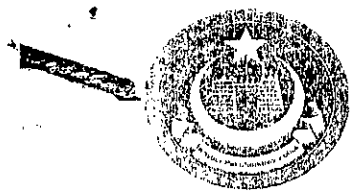
(MUHAMMAD KHAZ KHAN) PSP
CAPITAL CITY POLICE OFFICER,
PESHAWAR

No. 893-900 /PA dated Peshawar the 27 / 02 /2023

Copies for information and necessary action to the:-

1. SSP/Operations Peshawar.
2. AD/ICCP Peshawar.
3. EC-II, CRC, OASI & Pay Officer
4. FMC along with Fouji Missal.
5. Official Concerned.

Accepted
[Signature]



9

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted Ex-IHC Muhammad Ilyas No. 102. The petitioner was awarded major punishment of dismissal from service on the charges that he while posted as EC PP Arbab Tapu, PS Mattani Peshawar was found:

1. He was found taking undue advantage of his assigned duty. The fact was evident that he was getting bribe from different smugglers of the area & developed contacts with anti-social & criminal elements. Being hands in glove with smugglers, he brought bad name to police in general and Arbab Tapu Police in particular.

2. He has a pertinent reputation of being corrupt & has maintained a standard of living beyond his known source of income. The Appellate Authority i.e. Capital City Police, Officer Peshawar rejected his appeal vide Order Endst: No. 893-900/PA, dated 27.02.2023

Meeting of Appellate Board was held on 22.06.2023 wherein petitioner was heard in person. Petitioner denied the allegations leveled against him.

Perusal of enquiry papers reveals that the allegations leveled against the petitioner have been proved. During hearing, petitioner failed to advance any plausible explanation in rebuttal of the charges. The Board sees no ground and reasons for acceptance of his petition; therefore, the Board decided that his petition is hereby Rejected.

Sd/-
RIZWAN MANZOOR, PSP
Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar.

- CC/DO _____
- SSP/Coord: _____
- SSP/Q: _____
- SSP/Inv: _____
- SP/Comm: _____
- SP/City: _____
- SP/Recd: _____
- SP/Sec: _____
- SP/IO: _____
- SP/Tr: _____
- SP/Adm: _____
- SP/CC: _____
- SP/EC-II: _____
- AS/CC/Ad: _____
- TC/Adm/Sl: _____

23 /23, dated Peshawar, the 21-07- /2023.

Copy of the above is forwarded to the:

- 1. Capital City Police Officer, Peshawar. One Service Roll, One Enquiry File (135 pages) of the above named Ex-IHC received vide your office Memo: No. 8827/EC-II, dated 11.05.2023 is returned herewith for your office record.
- 2. SSP Operations, Peshawar.
- 3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
- 4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
- 5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar
- 6. PA to Registrar CPO Peshawar.
- 7. Office Supdt: E-IV CPO Peshawar.



5-Books
5-Rool
FHC
(DR/ZAHEED ULLAH) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

Attested
28/7