

# FORM OF ORDER SHEET

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

**Appeal No.** 1887/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/09/2023	<p>The appeal of Mr. Altaf Hussain presented today by Mr. Muhammad Aslam Tanoli Advocate. It is fixed for preliminary hearing before Single touring Bench at A.Abad on</p> <p>By the order of Chairman</p> <p>REGISTRAR</p>

BEFORE HONOURABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR

A - NO. 1887/2023

Altaf Hussain, LHC No. 289, District Police Mansehra. **(Appellant)**

**VERSUS**

1. Provincial Police Officer Khyber Pakhtunkhwa Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Mansehra. .... **(Respondents)**

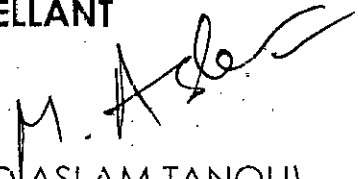
**SERVICE APPEAL**

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**APPELLANT**

THROUGH

  
(MUHAMMAD ASLAM TANOLI)  
ADVCCATE HIGH COURT  
ABBOTTABAD

Dated: 18-09-2023

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**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

**Appeal No.....**

Altaf Hussain, LHC No. 289, District Police Mansehra. (**Appellant**)

**VERSUS**

1. Provincial Police Officer Khyber Pakhtunkhwa Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Mansehra.

(**Respondents**)

**SERVICE APPEAL UNDER SECTION-4 OF KPK SERVICE TRIBUNAL ACT  
1974 AGAINST ORDER DATED 17-03-2022 OF THE DISTRICT POLICE  
OFFICER MANSEHRA WHEREBY APPELLANT HAS BEEN AWARDED  
PUNISHMENT OF "02 INCREMENTS STOPPED WITH CUMULATIVE  
EFFECT" AND ORDER DATED 05-09-2022 OF REGIONAL POLICE  
OFFICER HAZARA REGION ABBOTTABAD AND ORDER DATED 21-07-  
2023 OF PROVINCIAL POLICE OFFICER KPK PESHAWAR WHEREBY  
DEPARTMENTAL APPEAL AND REVISIONAL PETITION HAVE BEEN  
RESPECTIVELY FILED/REJECTED.**

**PRAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEAL ALL THREE  
ORDERS DATED 17-03-2022, 05-09-2022 AND 21-07-2023 OF THE  
RESPONDENTS MAY GRACIOUSLY BE SET ASIDE AND APPELLANT BE  
RELEASED HIS 02 YEARS STOPPED INCREMENTS WITH GRANT OF ALL  
CONSEQUENTIAL SERVICE BACK BENEFITS ON RENDITION OF  
ACCOUNT.**

Respectfully Sheweth:

1. That while appellant posted on traffic duty, he was issued a Charge Sheet dated 30-12-2021 on the basis of a false & fabricated complaint filed by one M.st. Jamila Bibi W/O Razaqat Hussain R/O Village Sum Ellahi Mansehra against appellant which was duly replied explaining facts of the matter and denying the allegations leveled therein being incorrect and

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baseless. **(Copies of Complaint, Charge Sheet and its Reply are attached as Annexure-"A,B,C).**

2. That later on appellant was served upon with a Final Show Cause Notice dated 25-02-2022 which was also replied on 02-03-2022 and the allegations were denied being false and fabricated. **(Copies of Final Show Cause Notice and its Reply are attached as Annexure-"D & E").**
3. That as per District Police Officer Mansehra on receipt of inquiry report he awarded appellant with punishment of "02 increments stopped with cumulative effect" vide order dated 17-03-2022. **(Copy of punishment order dated 17-03-2022 is Annexure- "F").**
4. That on 16-12-2021, the appellant was on traffic duty at Shinkiyari Bazar Mansehra from morning to evening 19:30 hours. As per complaint the time of occurrence was 06:30 pm. Similarly place of occurrence was shown "village Sum Ellahi" which is situated at a distance of 45 to 50 minute's travel from place of appellant's duty. A Jirga was convened on 17-12-2021 between the parties. Appellant was not part of this Jirga. Further appellant neither went to the house of complainant nor ever telephonically called or threatened her. The charges are totally false and fabricated. In his reply to the charge sheet the appellant had requested the departmental authorities to collect CDRs of both the telephone numbers, so that grain could be sifted

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from chaff. Complaint against appellant has been filed on behest of his opponents who instigated the complainant. Appellant is totally innocent in this matter and has done nothing wrong. Daily dairy of duty dated 16-12-2021 will be produced at the time of submission of rejoinder or arguments.

5. That appellant aggrieved the of punishment order filed a departmental appeal before the Regional Police Officer, Hazara Region, Abbottabad which was filed/rejected vide order dated 05-09-2022. **(Copies of departmental appeal and its rejection order dated 05-09-2022 are attached as "G & H").**

6. That thereafter appellant filed a Revision Petition before the PPO KPK Peshawar which was also rejected on 21-07-2023 but copy of the same was neither address nor delivered to the appellant. Appellant filed an application dated 29-08-2023 and obtained Rejection Order. **(Copies of Revision Petition, its rejection order and application are attached as Annexure-"I, J, K).**

7. Hence instant service appeal inter alia on the following as well as other grounds:

**GROUND:-**

A) That all the three orders dated 17-03-2022, 05-09-2022 and 21-07-2023 of the respondents are illegal, unlawful against the facts, departmental rules, regulations and principle of natural justice hence are liable to be set aside.

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- B) That no proper departmental inquiry was conducted. No witness was called to appear before the Inquiry Officer and depose against appellant in his presence. Inquiry report, if any, was also not issued to appellant. Even the appellant was not provided with the opportunity of personal hearing and he was condemned unheard in serious violation of law, departmental rules & regulations, facts and principle of natural justice.
- C) That appellant never involved himself in any such act as has been alleged in the complaint against him. Appellant has been got arrayed in the complaint by his opponents instigating the complainant. Appellant is innocent in this matter and nothing adverse has been brought on record against him during the course of departmental inquiry.
- D) That respondents have not treated the appellant in accordance with law, departmental rules, regulation and policy on the subject and have acted in violation of Article-4 of the constitution of Islamic Republic of Pakistan 1973 and unlawfully issued the impugned orders which are unjust, unfair hence not sustainable in the eyes of law.
- E) That appellate authority has also failed to abide by the law and to consider the grounds taken in the memo of appeal and has rejected the departmental appeal. Thus act of respondent is contrary to the law as laid down in the KPK Police Rules 1934 read with section 24-A of General Clauses Act 1897 and Article-10 of the Constitution of Islamic Republic of Pakistan 1973.

- F) That the allegations leveled against appellant in the disciplinary proceeding are incorrect, false, fabricated and included in the complaint on the instigation of appellant's opponents. Appellant never involved himself in any such activity as alleged against him. He is innocent and there is nothing wrong on his part.
  
- G) That instant service appeal is well within time and this honorable Service Tribunal has got every jurisdiction to entertain and adjudicate upon the lis.

**PRAYER:**

It is, therefore, humbly prayed that on acceptance of instant service appeal all the three orders dated 17-03-2022, 05-09-2022 and dated 21-07-2023 of the respondents may graciously be set aside and appellant be released his "02 stopped increments" with all consequential service back benefits on rendition of account. Any other relief which in the circumstances of the case this honorable Tribunal deems fit may also be granted.

Through

*[Signature]*  
Appellant  
*M. Aslam*

(Muhammad Aslam Tcnoli)  
Advocate High Court  
At Abbottabad

Dated: / 8 -09-2023

**VERIFICATION**

It is verified that contents of instant service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Dated: / 8 -09-2023

*[Signature]*  
Appellant

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**BEFORE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

Altaf Hussain, LHC No. 289, District Police Mansehra. **(Appellant)**

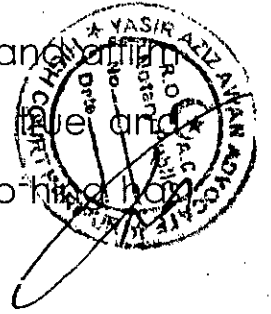
**VERSUS**

1. Provincial Police Officer Khyber Pakhtunkhwa Peshawar.
2. Regional Police Officer. Hazara Region, Abbottabad.
3. District Police Officer, Mansehra. ....(Respondents)

**SERVICE APPEAL**

**AFFIDAVIT**

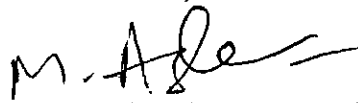
I, Altaf Hussain, appellant do hereby solemnly declare and affirm on oath that contents of instant service appeal are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.



Dated: 18-09-2023

  
**Deponent/Appellant**

Identified By:

  
(Muhammad Aslam Tanoli)  
Advocate High Court  
ABBOTTABAD

Dated: 18-09-2023

  
**Appellant**



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**BEFORE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

Altaf Hussain, LHC No. 289, District Police Mansehra. **(Appellant)**

**VERSUS**

1. Provincial Police Officer Khyber Pakhtunkhwa Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Mansehra. .... **(Respondents)**

**SERVICE APPEAL**

**CERTIFICATE**

It is certified that no such appeal prior to this one on the subject has ever been filed in this Honorable Service Tribunal or any other court.

Dated: 18/09-2023

  
**Appellant**

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**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Altaf Hussain, LHC No. 289, District Police Mansehra. **(Appellant)**

**VERSUS**

1. Provincial Police Officer Khyber Pakhtunkhwa Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. District Police Officer, Mansehra..... **(Respondents)**

**APPLICATION FOR CONDONATION OF DELAY IN FILING INSTANT SERVICE  
APPEAL BEFORE THIS HONOURABLE SERVICE TRIBUNAL.**

Respectfully Sheweth:

1. That applicant/appellant has filed today a Service Appeal which may be considered as part and parcel of this application, against order dated 17-03-2022, 05-09-2022 and 21-07-2023 passed by respondents, whereby appellant has been awarded penalty of "02 Increments stopped" and his departmental appeal as well as Revision Petition had been rejected without jurisdiction and abiding by procedure.
2. That as the orders of departmental authorities have been passed in violation and derogation of the statutory provision of law, departmental rules and regulation governing the terms and condition of appellant's service and fact of the case, therefore, causing a recurring cause of action to the applicant/appellant can be challenged and questioned irrespective of a time frame.
3. That though appellant's Revision Petition was rejected on 21-07-2023 but copy of order was delivered on 29-08-2023 & that too on his written request. The appellant has rigorously been pursuing his case. Therefore, the delay if any, in filing instant service appeal is due to the foregoing reasons.
4. That instant application is being filed as an abundant caution for the condonation of delay, if any. The impugned orders are liable to be set aside in the interest of justice.

It is, therefore, respectfully prayed that on acceptance of the instant application the delay, if any, in filing of titled appeal may graciously be condoned.

Through

  
Applicant/Appellant

(Muhammad Aslam Tanoli)  
Advocate High Court  
At Abbottabad

Dated: 18-09-2023

**Affidavit.**

It is verified that contents of instant service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

Dated: 18-09-2023

  
Applicant/Appellant

گزارش دعوت سالانہ دہلی ڈیر سوسائٹی  
 کا ریفرنس سالانہ ناخاند بسا سالانہ روزگار راولپنڈی مقیم  
 سے الطاف ولد لویب کے گھر میں ایک روز ہفت روزہ ہفت روزہ  
 کے نام سے ایک کھانا کرایا گیا۔ اس کے بعد گھر میں جو کچھ  
 مکان کی چادر چھت کھائی اور مہر خاں نے خون کرنے دھوکیاں  
 میں سب دروازے نہیں کھولا تو ناز پاشا نے گم گھوڑی کی شہرت  
 پر عمل کیا بھانجے سے یہ فنکاروں جاکے کھانا کھانے کے  
 جاکے کھانا کھانے کے بعد مذکورہ اسکائی ہوئے اور پھر آج خانگی طور  
 پر نہ سما سونے اور چرگ میں مذکوران نے شہرت کھانا کھانے  
 کھانا کھانے کے بعد اس کے کھانا میں ہمارے خلاف رپورٹ کھانا  
 مذکوران کے مطابق اس کے برادر ایقوب، شہانظر ولد ولی السرخان ساکنان  
 سے رہے ہیں اور آج چرگ میں جہاں دھوکیاں جینے رہتے ہیں  
 نہ ہر ایک دروازے اور نہ مانتا ہے۔ مذکوران ملک خلاف کھانا

عملیہ روزانہ رفاقت میں قوم جس کے نام سے  
 0311-5513994  
 17/12  
 17/21

9  
 17-12-21

Accepted  
 [Signature]

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CHARGE SHEET

Annex-B

I, Sajjad Khan (PSP), District Police Officer, Mansehra as Competent Authority, hereby charge you LHC Altaf No.289 Police Lines as follows.

Refer to the enquiry conducted by SHO PS Shinklari You LHC Altaf No.289 while posted as TO Traffic Staff make phone calls to Mst: Jarreela Bibi w/o Rifaqat r/o Sum Elahi Mang and threatened/abused her. Due to your this act on 17-12-2021 an incident took place in vi laga Sum Elahi Mang in which 02 persons were injured. It shows that you are indiscipline and irresponsible police official. It amounts to gross misconduct.

Due to reasons stated above you appear to be guilty of misconduct under Khyber Pakhtunkhawa Police Disciplinary Rules 1975 (amended in 2014) and have rendered yourself liable to all or any of the penalties specified in the said Police Disciplinary Rules.

You are, therefore, required to submit your written defense within 07 days of the receipt of this charge sheet to the enquiry officer.

Your written defense, if any, should reach the enquiry officer within the specified period, failing which it shall be presumed that you have no defense to put in and in that case exparte action shall follow against you.

Intimate whether you desire to be heard in person or otherwise.

Statement of allegation is also enclosed.

  
District Police Officer,  
Mansehra

Alteaf  
289

(11)

DISCIPLINARY ACTION

Shahid Khan (PSP), District Police Officer Mansehra, as Competent Authority of the Department that LHC Altaf No.289 Police Lines has rendered himself liable to be proceeded against as he committed the following act/omissions within the meaning of Khyber Pakhtunkhwa Police Disciplinary Rules 1975 (amended in 2014).

Refer to the enquiry conducted by SHO PS Shinkiari You LHC Altaf No.289 while posted as TO Traffic Staff make phone calls to Mst: Jameela Bibi w/o Razaqat r/o Sum Elahi Mang and threatened/abused her. Due to your this act on 17-12-2021 an incident took place in village Sum Elahi Mang in which 02 persons were injured. It shows that you are indisciplined and irresponsible police official. It amounts to gross misconduct.

For the purpose of scrutinizing the conduct of the said accused Officer with reference to the above allegations. Mr. DSP- Oghi is deputed to conduct formal departmental enquiry against LHC Altaf No.289 Police Lines. The Enquiry Officer shall in accordance with the provisions of the Khyber Pakhtunkhwa Police Disciplinary Rules 1975 (amended in 2014), provide reasonable opportunity of hearing the accused, record findings and make recommendations as to punishment or other appropriate action against the accused.

The accused and a well conversant representative of the department shall in the proceedings on the date, time and place fixed by the Enquiry Officer.

  
District Police Officer,  
Mansehra

No 7035-36/PA dated Mansehra the 30-12-2021

**Copy of the above is forwarded for favour of information and necessary action to:-**

1. The Enquiry Officer for initiating proceedings against the defaulter officer under the provisions of the Khyber Pakhtunkhwa Police Disciplinary Rules 1975. Preliminary enquiry conducted by SHO PS Shinkiari is enclosed.
2. LHC Altaf No.289 Police Lines with the direction to submit his written statement to the Enquiry Officer within 07 days of the receipt of this charge sheet/statement of allegations and also to appear before the Enquiry Officer on the date, time and place fixed for the purposes of departmental proceedings.

  
District Police Officer,  
Mansehra

No. 7035-36/PA  
30-12-2021  
allotted  
(01)  
Attested  
E.H.G.

شعبہ ڈسٹریکٹ ایجنسی بری PA/36-7035 مورخ 02-12-30 دھرتی  
 ماسٹر کی لکھی ہوئی درخواست میں لکھا ہے کہ میرا نام ماٹرن ٹیچنگ ہے کہ میں  
 کو سہ ماہی اسکول کی اساتذہ کے طور پر ملازم کیا گیا تھا اور وہاں پر  
 کے خان کی چارج میں تھی۔  
 عالیجاہ ایف ایم ڈی قومی ہذا مورخ 12/02/30 کا نوٹس لکھ کر  
 لکھا تھا اور اسے DSP صاحبان کے پاس بھیج دیا تھا کہ وہ اسے  
 بار آرڈر جاری کر لیں تاکہ اسے اس کے فرائض کے لیے تیار کیا جا سکے۔  
 سے پہلے میں بازار شکاری کو جوڑا تھا۔ ڈیوٹی ٹائم صبح 10 بجے سے  
 شکاری سے دس بجے تک تھا۔ 4 تا 5 بجے تک اسے کسی مسافت پر  
 کے رات اپنے گاؤں اور گھر کو بھیج دیا گیا تھا تاکہ وہ صبح سویرے  
 میں سہ ماہی اسکول کی چارج میں آسکے۔ اس کے بعد اسے سہ ماہی اسکول  
 لکھ کر اس کے متعلق ڈیوٹی ٹائم میں اسے بھیج دیا گیا تھا تاکہ وہ  
 درخواست گزار کے گھر کو بھیج دیا جائے تاکہ وہ اس کے فرائض  
 شروع کر سکیں تاکہ وہ اس کے فرائض کو سنبھال سکیں اور  
 لکھا گیا ہے کہ صبح سویرے اسے بھیج دیا گیا تھا تاکہ وہ  
 بازار جمعہ میں بھیج دیا جائے تاکہ وہ اس کے فرائض کو  
 سنبھال سکیں۔ اس کے بعد اسے بھیج دیا گیا تھا تاکہ وہ  
 میں اس کے فرائض کو سنبھال سکیں۔ اس کے بعد اسے بھیج  
 دیا گیا تھا تاکہ وہ اس کے فرائض کو سنبھال سکیں۔ اس کے  
 بعد اسے بھیج دیا گیا تھا تاکہ وہ اس کے فرائض کو سنبھال  
 سکیں۔ اس کے بعد اسے بھیج دیا گیا تھا تاکہ وہ اس کے  
 فرائض کو سنبھال سکیں۔ اس کے بعد اسے بھیج دیا گیا تھا  
 تاکہ وہ اس کے فرائض کو سنبھال سکیں۔ اس کے بعد اسے  
 بھیج دیا گیا تھا تاکہ وہ اس کے فرائض کو سنبھال سکیں۔

جای علی - Annex  
 درخواست گزار نے جو اہلک میں اس کے بارے میں  
 دیکھا ہے وہ یہ ہے کہ اسے اس کے فرائض کو سنبھال  
 سے دیا گیا ہے۔ اس کے بعد اسے بھیج دیا گیا تھا تاکہ وہ  
 اس کے فرائض کو سنبھال سکیں۔ اس کے بعد اسے بھیج  
 دیا گیا تھا تاکہ وہ اس کے فرائض کو سنبھال سکیں۔ اس کے  
 بعد اسے بھیج دیا گیا تھا تاکہ وہ اس کے فرائض کو سنبھال  
 سکیں۔ اس کے بعد اسے بھیج دیا گیا تھا تاکہ وہ اس کے  
 فرائض کو سنبھال سکیں۔ اس کے بعد اسے بھیج دیا گیا تھا  
 تاکہ وہ اس کے فرائض کو سنبھال سکیں۔ اس کے بعد اسے  
 بھیج دیا گیا تھا تاکہ وہ اس کے فرائض کو سنبھال سکیں۔

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عالمیاء! درخواست گزار صفا جیلہ کی زوجہ فائزہ اصل و سماض جیلہ۔  
بقول گزار با معاملہ حل کیا تھا مگر پتے ان کو جوہور میں اور محل گزار شہر  
درخواست دی ہے چونکہ میں مدازم پولیس ریجنڈ کنٹرول ڈیوٹی سیریل سے  
تینا تے تھا۔ مگر میں نے حد اٹھائے کے لئے اس پر جوہور ڈال کر  
ان غرض سے نارٹھ کیا ہے الٹیائی جانے کے اس سے وہاں پر ما CDR کی حالت  
اصل و سماض کے پتے میں آسان ہو سکے۔

عالمیاء! درخواست گزار اور اس سے حامی سماض کے ساتھ مبارکی رہیں صلی آری ہیں  
جس سے وہ میں نے جوہور نارٹھ کے پتے میرا خلاف درخواست دی ہے اور  
آرٹھ کے مگر وہ سے حامی میری نواری کے بارے میں پتے پتے دیکھ رہی ہیں  
والدہ سزا کی مدد میں جو ان کو معصوم بن سوری۔ جو پر نا جائز و اس کے لئے  
حاضر درخواست دی گئی ہے اور جوہور سزا کی مدد میں آری ان کے لئے کوئی  
کی طرف سے ہے

عالمیاء! میں نے فلم میں بطور لقا اس فریق نسبی سزا کیام دینے میں ہوا رہی  
ڈیوٹی اور حکم کی عزت کیلئے سرگرم رہا ہوں۔ میرا سابقہ سروس ریکارڈ میری  
ڈیوٹی کے لئے جس کا گواہ ہے جسکی روشنی میں اس کے معاملہ عائد کردہ و سزا  
میں سے سزا و سزا کے لئے فرما رہی ہیں۔

الطاف حسین  
289  
LHC  
سپینہ نعلی  
پولیس لائن  
مانسورہ

Date -  
24/01/2022

Ahmed  
P.T.

OFFICE OF THE DISTRICT POLICE OFFICER MANSEHRA  
(Khyber Pakhtunkhwa Police)

No. 773 /PA, dated 25/02/2022

Tel: No. 0997-920102 and Fax No. 0997-920104

E-mail. dpomansehra1@gmail.com

Annex-D

FINAL SHOW CAUSE NOTICE

You LHC Altaf No. 289 were proceeded against departmentally with the allegation that refer to the enquiry conducted by SHO PS Shinkiari You LHC Altaf No.289 while posted as TO Traffic Staff make phone calls to Mst: Jameela Bibi w/o Razaqat r/o Sum Elahi Mang and threatened/abused her. Due to your this act on 17-12-2021 an incident took place in village Sum Elahi Mang in which 02 persons were injured. It shows that you are indisciplined and irresponsible police official. It amounts to gross misconduct.

In this connection you were proceeded against departmentally. Mr. Tahir Qureshi, DSP Oghi Enquiry Officer, after conducting proper departmental enquiry has submitted his finding report and proved your telephonic contact Mst: Jameela Bibi. The Enquiry Officer recommended you for appropriate punishment. I am agree with the report of Enquiry Officer and therefore, hereby finally call upon you to show cause as to why you should not be awarded major/minor punishment under the Khyber Pakhtunkhwa Police Disciplinary Rules 1975 (amended in 2014). In case your written reply is not received within 07 days after the receipt of this final show cause notice it shall be presumed that you have no defense to offer. You are also allowed to appear before the undersigned, if you so desire. (Copy of the finding of the Enquiry Officer is also enclosed).

*Arrested*  
*21/12/21*

  
District Police Officer,  
Mansehra



Handwritten notes at the top of the page, including the number 15 in a circle and some illegible text.

Main body of handwritten text in Urdu, detailing a personal account or legal case. The text is written in a cursive style and covers most of the page.

CHC/OR

DPO Hanse

Handwritten signature at the bottom center of the page.

عالمیہ درخواست گزار کے الزام کے باوجود قحطی پھرنے لگی تھی۔ یاد میں اکثر میں حسین اور علی نے  
 حلقہ طور پر سبائی سولہ گنہ میں سے کوئی ایک سوال کیا اور یہ بھی کسی درسی کتاب سے  
 اسی میں کو اس متعلق اس کا یا یا رعایت کی درخواست گزار کی دیکھ میں کسی کو  
 کر جو سب سبابت گمراہ کن الزامات لگائے تھے قبل از میں بھی دیکھ میں اس  
 متعلق اسی اور رعایت نہیں کہ درخواست گزار کے گمراہ کن سببوں اور گمراہ کن  
 وغیرہ کیا ہے۔ نیز کہ درخواست گزار کے ضد درسی امتحان کے ساتھ اور کتبیں  
 صحت پر بھی ہیں۔ جواب اصل پر تھا کہ خود گمراہ اور شاہ نواز وغیرہ  
 ہر طرف درخواست دی جو کہ میں لازم ہوگی سولہ ضد گمراہ کن ضد امتحان کے  
 امکان پر سب اور سب گمراہ کن کے خلاف دماغ ذال کے خلاف ہادی سولہ  
 غرض سے نارکت کیا ہے اور دماغ ذال پر بھی ہے۔

لجاء درخواست گزار اور اس کے حامی امتحان کے ساتھ میرا ہانڈن کی سبب اور کتبیں  
 اور بھی ہیں جس کے وجہ سے مجھے نارکت کرنے کیلئے میرا خلاف درخواست دی ہے اور کوئی  
 نہیں اور میں بھی میرا جتنی بھی ہے اور خلاف گمراہ کن درخواست دی گئی جو کہ گمراہ کن کے خلاف  
 کے سولہ گنہ کے متعلق ہے نیز یہ سب اور آڈیو ریڈ اور جو بیوی سے موجود ہے مجھے میں  
 سے بھی نارکت کیا جاتا ہے دیکھ میں دماغ سولہ کے خلاف گمراہ کن سولہ۔ مجھے  
 نیز اسان کے کہنے اور شہاد پریشان کرنے کیلئے درخواست دی ہے۔  
 بدلے انتقام لینے کے بغیر کچھ نہیں ہے۔

اد میں نے قلم پوئیں میں لکھ کر اس میں میں نے سب سے سزا جام دے دی ہے  
 دینی ڈیوٹی اور قسم کی غرت کے لیے سزا دیا میں میرا بقدر کیا اور  
 میری ڈیوٹی اور ڈسپن یا گمراہ ہے جسکی اور میں اس کے ساتھ گمراہ  
 اسے میرا فریڈر شکور زمان میں

الطاف حسین حالی 289 ضمیمہ دستخط ہو گیا اور ان کے ہاتھ

Dated 22/03/2022  
 All the best  
 H.T.

POLICE DEPARTMENT



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Annex-F

MANSEHRA DISTRICT

ORDER

This office order will dispose off the departmental enquiry proceeding against LHC Altaf No. 289 who was proceeded against departmentally with the allegation that refer to the enquiry conducted by SHO PS Shinkiari, he while posted as TO Traffic Staff make phone calls to Mst: Jameela Bibi w/o Razaqat Sum Ehali Mang and threatened/abused her. Due to his this act on 17.12.2021 an incident took place in Village Sum Ehali Mang in which 02 persons was injured.

The Enquiry Officer i.e. Mr. Raja Tahir, SDPO Oghi Circle after conducting proper departmental enquiry has submitted his report and proved the charges leveled against him. On 17.03.2022, the delinquent LHC Altaf No. 289 was heard in person in orderly room but he could not convince the undersigned in his defense.

I, the District Police Officer, Mansehra, therefore award him punishment of "02 increments stopped with cumulative effect" to the delinquent LHC Altaf No. 289, under Khyber Pakhtunkhwa Police, Disciplinary Rules 1975 (amended in 2014). He is reinstated in service and pay released.

Ordered announced.

OB No. 39  
Dated 17/03 2022

Abdullah  
E49

  
District Police Officer  
Mansehra

148

Annex-9

To

The Honorable,

DIG Hazara Region Abbottabad.

Respected Sir,

With due respect and to state that the honorable District Police Officer Manshra awarded me (02 increments stop with cumulative after premierly inquiry conducted by Raja Tahir SDPO Oghi Circle (Order passed by Honorable District Police Officer Manshra vide OB No 39 dated 17-03-2022. (A copy of above order is enclosed here with for your kind perusal).

In this prospect that the honorable District Police Officer Manshra called me in orderly room and I enumerated to him whole story of inquiry but the honorable District Police Officer Manshra did not exonerated me and gave punishment.

It is therefore, requested that I am innocent and whole matter was planted by Jameela Bibi wife of Razaqat.

I may kindly be exonerated from the order of Honorable District Police Officer Manshra.

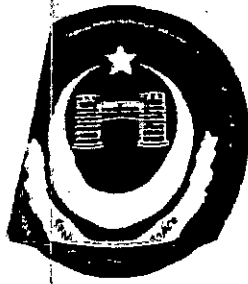
Your's Most Obediently

**Altaf Hussain**

LHC No 289

Police Line Manshra

Accepted  
EIT



19

OFFICE OF THE REGIONAL POLICE OFFICER  
HAZARA REGION, ABBOTTABAD

0992-9310021-22

0992-9310023

r.rpohazara@gmail.com

NO: 670-71/PA DATED 5/9/2022

**ORDER**

This order will dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by LHC Altaf No.289 of District Manshera against the order i.e. *stoppage of two years increments with cumulative effect* awarded by DPO Manshera vide OB No.39 dated 17.03.2022.

Brief facts leading to the punishment are that the appellant while posted as TO Traffic Staff made phone calls to Mst: Jameela Biti w/o Rafaqat r/o Sum Elhai Mang and threatened/abused her. Due to his this act on 17.12.2021 an incident took place in village Sum Elhai Mang in which 02 persons were injured.

The appellant was issued charge sheet along with summary of allegations and SDPO Oghi was deputed to conduct departmental enquiry. The EO held the appellant responsible of misconduct. Consequently, DPO Manshera awarded him minor punishment of stoppage of two years increments with cumulative effect. Hence, the appellant submitted this present appeal.

After receiving his appeal, comments of DPO Manshera were sought and examined/perused. The undersigned called the appellant in CR and heard him in person. The appellant has been given reasonable opportunity to defend himself against the charges, however he failed to advance any justification. Thus, the disciplinary action taken by the competent authority seems reasonable and the appeal is liable to be dismissed. Therefore, in exercise of the powers conferred upon the undersigned under Rule 11-4 (a) of Khyber Pakhtunkhwa Police Rules, 1975 the instant appeal is hereby *filed/rejected* with immediate effect.

*src/19/12*  
*for n/a*  
*DPO/Manshera*  
*13/9*

*Mirvais Niaz*  
Mirvais Niaz (PSP)  
REGIONAL POLICE OFFICER  
HAZARA REGION, ABBOTTABAD

Cc.

The District Police Officer, Manshera for information and necessary action with reference to his office Memo No.6415/PI dated 09-06-2022. Service roll and fouji missal containing enquiry file of the appellant is returned herewith for record.

5945  
19/9/22

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Annex - 2

TO

The Honorable  
Inspector General Of Police  
KPK Peshawar

Respected Sir,

With due respect It is stated that the honorable district police officer Mansehra awarded me (02 increments stop with cumulative effect) inquiry conducted by Raja Tahir SDPO Oghi circle (ordered passed by honorable District Police Officer Mansehra vide OB No 39 Dated 17-03-2022. A copy of above order is enclosed here with your kind perusal).

In this prospect that the honorable district police officer Manshera called me in orderly room and I enumerated him the whole story of inquiry but District police Officer Mansehra did not exonerated me and gave punishment.

I performed a departmental appeal to honorable regional Police Officer Hazara Region Abbottabad on 25-03-2022 which was rejected vide order no 670-71/Pa Dated 05-09-2022 copy attached.

It is therefore requested that I am innocent and whole matter was planted by Razaqat.

I may kindly be exonerated from order of district police officer Mansehra and RPO Hazara Region Abbottabad.

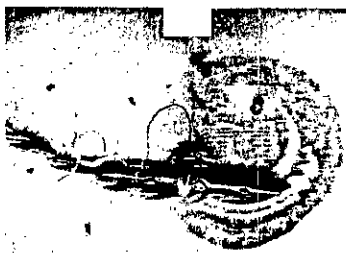
Your obediently,

ALTAF HUSSAIN

LHC No 289

PP Gittidas PS Kaghan  
Mansehra

Attested  
E.H.9



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OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Annex - J

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted LHC Altaf Hussain No. 289. The appellant while posted as TO Traffic Staff made phone calls to Mst: Jameela Bibi w/o Razaqat & threatened/abused her. Due to this act on 17.12.2021 an incident took place in village Sum Elhai Mang in which 02 persons were injured. The Appellate Authority i.e. RPO Hazara rejected his appeal vide order Endst: No. 671-71/PA. dated 05.09.2022.

Meeting of Appellate Board was held on 22.06.2023 wherein petitioner was heard in person. Petitioner contended that he is innocent.

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.

No. S. 1787-79 /23, dated Peshawar, the 21-07-2023.

Copy of the above is forwarded to the:

308

1. Regional Police Officer, Hazara. One Service Roll, One Fauji Missal (Containing Enquiry File) of the above named LHC received vide your office Memo: No. 1787, dated 29.11.2022 is returned herewith for your office record.
2. District Police Officer, Mansehra.
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.

Office of The Regional Police  
By No. 13292  
Dated 1/8/23  
Hazara Region-II Abbottabad

SRC/0A  
DPS Mansehra

No. 14163/E  
02-08-23

EC/DPO Mansehra  
For action so Acknowledged the  
S/Roll, Fauji Missal &  
Enquiry File.

DIG/Hazara  
01/08

Alerted  
E49

(DR. ZAHEED ULLAH) PSP  
AIG/Establishment,  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

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Annex-K

ذاتی

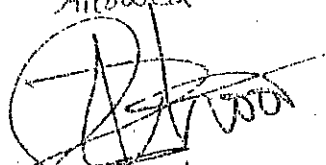
1. ...  
 2. ...  
 3. ...  
 4. ...

...  
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...

...

28/08/2023

SRC  
 Allowed  
  
 S.P. Hanshra

Attested  
 E.H.



# وکالت نامہ

بعدالت جناب **خدیجہ بیگم خواجہ سرور** ٹریڈنگ سٹار  
مخانب **ایڈلٹی الرٹاؤ صینہ**

**الطاف حسین**  
دکوی یا جرم **سرور اپیل** باعث تحریر نامہ

مندرجہ بالا عنوان میں اپنی طرف سے بیروی و جوابدہی مقام **ایڈٹ آباد / سٹار**  
**حمیرا کیمز می ایل ڈی و کیسٹ** بدین شرط و کیل مقرر کیا کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص  
رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی  
پیشی پر مظہر حاضر نہ ہوا۔ اور حاضری کی وجہ سے کسی وجہ پر مقدمہ میرے خلاف ہو گیا تو وہ جب موصوف اس کے کسی طرح ذمہ دار نہ  
ہوئے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ یا پکھری کے مقرر اوقات سے پہلے یا بروز  
تعطیل بیروی کرنے کے مجاز نہ ہوئے۔ اگر مقدمہ مقام پکھری کے کسی اور جگہ باعث ہونے یا بروز پکھری کے اوقات  
کے آگیا یا پہلے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے زانیے کسی معاوضہ ادا کرنے مختار نامہ واپس کرنے کے  
بھی صاحب موصوف ذمہ دار نہ ہوئے۔ مجھے کمال ساختہ پر وادخیز صاحب منشی کرور وزارت خود منظور و قبول ہوگا اور صاحب  
موصوف کو عرضی دکوی اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق  
کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کاروبار و وصول کرنے اور رسید دینے اور وائل کرنے  
کا ہر قسم کا بیان دینے اور سپروٹاٹی و راضی نامہ و فیصلہ برخلاف کرنے اقبال و ٹوے کا اختیار ہوگا۔ اور بصورت اپیل و  
برآمدگی مقدمہ یا منسوخی ڈگری یا طرفہ درخواست حکم اختتامی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو  
بشرط ادائیگی علیحدہ بیروی مختار نامہ کرینکا مجاز ہوگا۔ اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا بیرٹر  
کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہونگے جیسے صاحب  
موصوف کو۔ پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیروی نہ  
کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے کہ سند سے مضمون  
مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا اور منظور ہے۔

Accepted by  
M. Aslam

مورخہ: 18-09-2023

(الطاف حسین)