


FORM OF ORDER SHEET

Court of _____

Appeal No. 2042/2023


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/10/2023	<p>The appeal of Mr. Abdul Wahab presented today by Mr. Muhammad Ilyas Orakzai Advocate. It is fixed for preliminary hearing before Single Bench at Swat on _____ Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Rahmat Jalil Ex-Police Constable no. 3920 District Police Chitral received today i.e on 18.09.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Paper used in printing of grounds of appeal is low standard.
- 2- The law under which appeal is filed is not mentioned.
- 3- Copy of rejection order of first departmental appeal dated 10.9.2022 is not attached with the appeal.
- 4- Copy of revision petition which is rejection on 21.07.2023 is not attached with the appeal be placed on it.
- 5- Annexures-B & D of the appeal are illegible which may be replaced by legible/better one.
- 6- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal

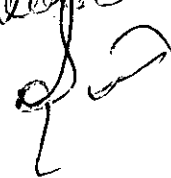
No. 3241 /S.T.


Dt. 19-9 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Ghufan Ullah Shah Adv.
High Court at Peshawar.

R/s

Resubmitted for extension of time please.


Objections No. 1, 3, 4 and 6 are still standing. Hence, the appeal is returned again to the learned counsel for resubmitting the same within ^{(seven (7))} ~~15~~ days after removal of objections.




28/09/23
Asst. Registrar

No. 3317 /ST


Dated: 28/9/23

R/Sir

Due to out station professional
engagement of the Counsel and
un ability to contact his client
the deficiencies are not complied,
therefore requested to extend the
refiling time and date please.


Counsel
04-10-2023

R/Sir : The case is re submitted
after removal of
office objections for further
proceedings please


Counsel

BEFORE THE KHYBER PAKHTUNKHUWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. 2042/2023

Rahmat Jalil

V E R S U S

Government of Khyber Pakhtunkhwa (KPK) through the Secretary Home
and Tribal affair KPK Peshawar

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Appellant

Through

.....
Syed Ghufan ullah Shah
(Advocate Peshawar)
Office; 22-A Nasir Mansion
Railway Road, Peshawar
Cell No.0334-9185580

BEFORE THE KHYBER PAKHTUNKHUWA
SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 2042/2023.

Rahmat Jalil

S/o Ali Rahmât, Resident of P.O Garam Chashma Village Munoor
Tehsil & District Chitral, Ex-Police Constable No. 3920 District
Chitral(Lower).

.....Appellant

V E R S U S

1. Government of Khyber Pakhtunkhwa (KPK) through the Secretary Home and Tribal affair KPK Peshawar.
2. Inspector General of Police Khyber Pukhtunkwa Peshawar.
3. AIG/Establishment for Inspector General of Police Khyber Pukhtunkwa Peshawar.
4. Deputy Inspector General of Police Malakand Division Saidu Sharif Sawat.
5. District Police Officer Chitral.
6. Secretary Finance Government of K.P.K at Civil Secretariat Peshawar.

.....Respondents

Appeal U/S 4 of KPK, Service Tribunal Act 1974 against the impugned Order bearing No. 3652-58 dated 14-06-2022 issued by District Police Officer Chitral/Respondent No.5; whereby the appellant has been imposed major Penalty of dismissal from service, followed by impugned order of Inspector General of Police KPK /Respondent No.2 bearing No. 1904-07/2023 dated 21-07-2023 (issued on 17.08,2023) whereby his departmental appeal has been finally rejected.

Prayer;

On acceptance of the instant Service Appeal the impugned termination order of appellant bearing No. 3652-58 dated 14-06-2022 issued by District Police Officer Chitral/Respondent No.5 as well as impugned final order in appeal passed by Inspector General of Police KPK /Respondent No.2 bearing No. 1904-07/2023 dated 21-07-2023 along with all adverse orders against appellant ; be set aside and the appellant be reinstated in service with all sub sequential benefits.

Any other relief including recovery of salaries etc which deems just and proper in the circumstances of the case may also be granted to the appellant.

Respectfully Sheweth:

Brief facts and grounds giving rise to the instant Service Appeal are as under:

1. That the appellant joined Service in Police department as constable on 27-08-2013 and was allotted Police No. 3920 in Chitral District where he rendered spotless service and no adverse remarks whatsoever assigned to him from any quarter.
(Copy of Service Card is annexure "A")
2. That the appellant served Police Department for more than 09 years with full commitment and professionalism.
3. That upon the complaint of private person namely Amjad Ali S/O Rahmat Ali Khan alleging the appellant for having taken bribe of Rs.1,20000/- from him on account of appointment in Police Department, he was proceeded departmentally and was awarded major penalty of dismissal from Service vide impugned office order bearing No. 3658 dated 14-06-2022 issued by District Police Of Chitral/Respondent No.5.

(Copy of impugned order dated 14-06-2022, is Annexure

4. That on 30-06-2022, the appellant filed departmental appeal to the high ups of the department against the impugned dismissal order dated 14-06-2022.
(Copy of departmental appeal dated 30-06-2022 is annexure "C")
5. That the matter remained under consideration before the highest brasses of Police Department and finally rejected by Inspector General of Police KPK /Respondent No.2 vide impugned order bearing No. 1904-07/2023 dated 21-07-2023 issued on 17-08-2023 (Annexure-"D"); hence the instant appeal amongst the following other grounds.

GROUND:

- A. That from the very beginning respondents have failed to deal the appellant in accordance with law because the above named complainant has submitted an affidavit that there was a dispute between the parties for return of Loan and he has malafidely complaint against appellant with effect to recovery of the same and in absence of alleged complaint imposition of major penalty upon appellant is against the established law.
- B. That the appellant has been given no proper opportunity to defend himself and no proper enquiry has been made about the relevancy of the complaint with the appellant that whether the appellant was competent to make any appointment in police department or whether the complainant was Candidate in any recruitment process or whether the appellant has received any bribe from complainant etc, therefore in absence of any proper and competent enquiry, award of major penalty is against the administration of justice and ineffective upon the rights of appellant.
- C. That as per mandate of Civil service the respondents were required firstly to affirm the complaint against appellant and subsequently charged him under the applicable criminal law and on the basis of alleged offence and other reliable evidences proceed departmentally but in the instant case neither any criminal case is made out nor any allegation

established against the appellant, therefore the entire proceedings are arbitrary and illegal.

- D. That no judicial or private evidence has been produced against the appellant nor he has been associated with proceeding neither given an opportunity to cross examine the allegations leveled against him. Furthermore the allegation leveled against the appellant are not even related to act or omission done under color of uniform of the appellant but pertains to private life of the appellant, therefore would not be based for dismissal from service.
- E. That the proceedings of the so-called inquiry was defective one, the witnesses have never been cross-examined by the appellant and the appellant was kept in darkness and was posted to a very far flung Police Station and was never accompanied with the inquiry proceedings.
- F. That the punishment is too severe and is not proportionate to the gravity of alleged offence.
- G. That the appellant was given no chance of personal hearing and it is a demand of natural justice that no one should be condemned unheard.
- H. That in light of the afore mentioned situation the imposed penalty is not only arbitrary and illegal but also harsh and unnatural.
- I. That the acts and omission of respondents is against the Civil Service Act 1973, Efficiency and Disciplinary Rules and applicable Fundamental and Supplementary Rules.
- J. That the instant appeal relates to terms and conditions of civil servant and this honorable tribunal has been vested with statutory power to entertain the matter.
- K. That any other ground be furnished when ever required for the assistance of this honourable Tribunal in support of the

subject appeal with prior permission as required by procedure.

It is, therefore, most humbly prayed that the instant Service Appeal be allowed as prayed for.

Ruet
Appellant

Through

[Signature]
Syed Ghulam ullah Shah
Advocate Peshawar

BEFORE THE KHYBER PAKHTUNKHUWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. _____ 2023

Rahmat Jalil

V E R S U S

Government of Khyber Pakhtunkhwa (KPK) through the Secretary
Home and Tribal affair KPK Peshawar

AFFIDAVIT

I, Rahmat Jalil S/o Ali Rahmat R/o Garam Chashma Munoor Tehsil
Tehsil & District Chitral, Ex-Police Constable No. 3920 District
Chitral. Appellant; do hereby solemnly verify and declare on oath
that all the contents of the subject appeal; are true and correct to the
best of my knowledge and belief and nothing has been concealed
from this Honourable Tribunal.

Rahmat
Deponent

C.N.I.C No 15201-1052353-5

Verified by:

[Signature]
Syed Ghufan ullah Shah
Advocate Peshawar



**BEFORE THE KHYBER PAKHTUNKHUWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. _____ 2023.

Rahmat Jalil

VERSUS

Government of Khyber Pakhtunkhwa (KPK) through the Secretary
Home and Tribal affair KPK Peshawar

ADDRESSES OF PARTIES

APPELLANT;

Rahmat Jalil

S/o. Ali Rahmat R/o Garam Chashma Munoor Tehsil Tehsil &
District Chitral, Ex-Police Constable No. 3920 District Chitral.

RESPONDENTS;

1. Government of Khyber Pakhtunkhwa (KPK) through the Secretary
Home and Tribal affair KPK Peshawar.
2. Inspector General of Police Khyber Pukhtunkwa Peshawar.
3. AIG/Establishment for Inspector General of Police Khyber
Pukhtunkwa Peshawar.
4. Deputy Inspector General of Police Malakand Division Saidu Sharif
Sawat.
5. District Police Officer Chitral.
6. Secretary Finance Government of K.P.K at Civil Secretariat
Peshawar.

Rahmat
Appellant

Through

[Signature]
Syed Ghufraan ullah Shah
Advocate Peshawar

8

Ammed A's

POLICE
 Khyber Pukhtoon Khwa
 F.P. District Swat S.No.2720/Ec

Rahmat Jali
 Constable No.3920

S. FRP. MED RANGE SWAT

**FRP
 SWAT
 POLICE**

F/Name: All Rahmat
 NIC No: 15201-1052353-5
 Tell: No: 0333-928 9468
 D.O.Birth: 02.02.1993
 D.O.Appo: 27.08.2013
 Blood G: A+
 Height: 5' 10"
 Eyes: Black
 D.O.Issue: 22.04.2015 D.O.Exp: 19.04.2018
 Address: Vll: Muncor P/O Garam Chashma
 Tehsil Chitral Distt: Chitral.

Attested

PAKISTAN National Identity Card
 ISLAMIC REPUBLIC OF PAKISTAN

NAME: Rahmat Jalli

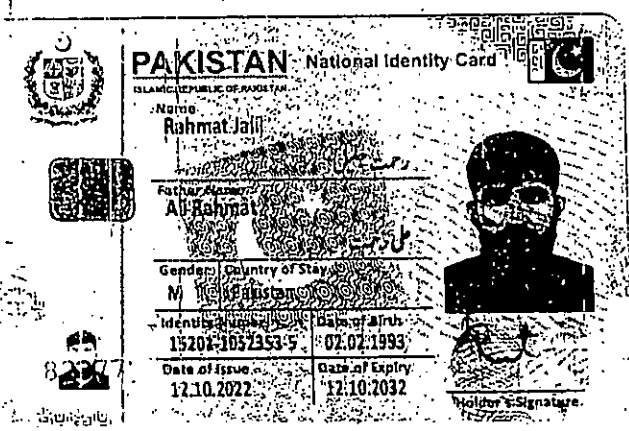
Family Name: Al-Rahmat

Gender: M Country of Stay: Pakistan

Identity Number: 15201-1052353-5 Date of Birth: 02.02.1993

Date of Issue: 12.10.2022 Date of Expiry: 12.10.2032

Holder's Signature



15201-1052353-5

سجل پیدائش خانہ گرم چتر، سرگودھا تحصیل، ضلع جہاں

سجل پیدائش خانہ گرم چتر، سرگودھا تحصیل، ضلع جہاں

505811013426

Registrar General of Pakistan

گمشدہ کارڈ ملنے پر ترقی لیٹر بکس میں ڈال دیں

Attested
 J.C.

(10)

Ammed B's

ORDER

This office Order will dispose of the departmental enquiry against Constable Rahmat Jalil No. 17 posted Police Station Shoghore.

Brief facts pertaining to the initiation of the enquiry are that, as per complaint of the applicant namely Amjad Ali S/O Rahmat Khan R/O Garum Chashma, Lower Chitral, he received bribe of Rs. 120,000/- from the applicant on the pretext of his appointment / recruitment in Police Department

His this act/omission being a serious crime on the part of a member of Law Enforcing Agency and deforming the reputation and credibility of local Police in the eyes of public was punishable under disciplinary law/rules; hence, a departmental action under Police Rules 1975 amended 2014 was initiated against him.

Accordingly, he was issued Charge Sheet along with Summary of Allegations vide this office order No.2702-03/E-II dated 10.03.2022 and Mr. Iqbal Karim DSQ HQ Chitral, Lower was appointed as Enquiry Officer under the referred rule.


Record reveals that during the course of enquiry, the delinquent Constable Rahmat Jalil No. 17 has been given ample opportunity of hearing & defense. After proper and impartial enquiry, the Enquiry Officer found him guilty and in his finding recommended him for Major punishment.

The undersigned perused the enquiry file, all relevant documents, found no material illegality or irregularity in the finding of enquiry officer or enquiry proceeding and the charge against the accused has proved beyond reasonable doubts.

He was issued Final Show Cause Notice vide this office order No.3021/E-II dated 27.05.2022, and heard him in person at Orderly Room on 14.06.2022, but his reply was found not satisfactory.

Since the Charge against the accused has proved beyond any shadow of doubt and keeping such a criminal minded person in the force is detrimental both for the Force and the public; therefore, upholding the report/recommendation of the Enquiry Officer the accused Constable Rahmat Jalil No. 17 is hereby dismissed from Service with immediate effect in the best interest of the public and Police Department.

Order Announced


District Police Officer
Chitral, Lower

No. 3652-58 /E-II, Dated Chitral Lower the 14/06/2022.

Copies to:

1. DSP HQs Chitral Lower.
2. SDPO Circle Lotkoh
3. SHO PS Shoghore.
4. Pay officer local office / Police Station.
5. Establishment Clerk
6. OHC for OB.
7. C.O Security Clarence / HRMIS Form

مکتوب جناب ریجنل پولیس آفیسر ملتان ڈسٹرکٹ سوات

عنوان:- ایجنٹ بر خلاف حکم جناب ڈسٹرکٹ پولیس آفیسر صاحبہ متعلق چرمان اور ڈیپٹی چرمان اور ڈیپٹی چرمان
3652-58/EII مورخہ 14.06.2022 جس کی رو سے سائل کو ڈگری سے ریٹائر کیا گیا ہے۔

جناب عالی!

ایجنٹ

حسب ذیل عرض پر دراز ہے۔

یہ کہ ایجنٹ بحیثیت کنستبل حرمہ تقریباً 09 سالوں سے ملتان ڈسٹرکٹ پولیس آفیسر ملتان ڈسٹرکٹ سوات میں
دوران کسی ایسے ہی قسم کی حکایت نامہ قلمبندی ہوئی ہے۔ یہ کہ ایجنٹ کے خلاف ایک نے بیجا دہلی نامہ قلمبندی کے سائل نے درج ذیل حکایت
دوسری اور تیسری کو کے ڈگری دہانے کے بعد اس کے خلاف ایک ایک کوئی نوٹ (120000) لیا ہے جس پر صرف ایک کو ڈگری دہانے
اور تیسری حکایت کے سائل کی شہادتوں کو مسترد کرتے ہوئے شہادتوں کے برعکس فیصلہ دیا ہے۔ ایجنٹ کو ڈگری سے ریٹائر کیا گیا ہے۔
کیا ہے۔ بالکل اولیٰ انگریزی اور فرانسیسی کے خود ترقی خود پر بیان لکھی گئی اور اس کے خلاف ایک ایک کو ڈگری دہانے پر ایک ایک کو ڈگری
ڈیپٹی چرمان صاحبہ نے ایک نوٹ لکھا ہے کہ انگریزوں نے خود ترقی خود پر بیان لکھی گئی اور اس کے خلاف ایک ایک کو ڈگری دہانے پر ایک ایک کو ڈگری
ایسا انجام دیا ہے کہ ایجنٹ کو ڈگری سے ریٹائر کیا گیا ہے۔ ایجنٹ کو ڈگری سے ریٹائر کیا گیا ہے۔ ایجنٹ کو ڈگری سے ریٹائر کیا گیا ہے۔
مگر وہ بالکل واضح ہے کہ ایجنٹ کے خلاف ایک نے بیجا دہلی نامہ قلمبندی کے سائل نے درج ذیل حکایت
شہادتوں اور حکایت کے برعکس فیصلہ دیا ہے۔ ایجنٹ کو ڈگری سے ریٹائر کیا گیا ہے۔ ایجنٹ کو ڈگری سے ریٹائر کیا گیا ہے۔
کے برعکس ہونے کے بعد، بریج چوہانی، امیر زبیدی، میر شہزیادہ صاحبہ اور دیگر نامی مشورتی ہے۔

انگریزی حالات گواہی ہے کہ ایجنٹ کے خلاف جناب ڈسٹرکٹ پولیس آفیسر چرمان اور ڈیپٹی چرمان اور ڈیپٹی چرمان کے حکم لکھی
3652-58/EII مورخہ 14.06.2022 جس کی رو سے سائل کو ڈگری سے ریٹائر کیا گیا ہے۔

ایجنٹ کو ڈگری سے ریٹائر کیا گیا ہے۔ ایجنٹ کو ڈگری سے ریٹائر کیا گیا ہے۔

Recd

برفانہ ملتان کنستبل ریٹائرمنٹ نمبر 17
ڈسٹرکٹ پولیس آفیسر چرمان

NO. 17/3
Dated 14.06.2022
Comments: Pending
Pending
Pending
Pending
Pending

Attested
Signature

Signature
Date: 14.06.2022

per him
reference
delivered by G

(12)



OFFICE OF THE
REGIONAL POLICE OFFICER, MALAKAND
AT SAIDU SHARIF SWAT.
Ph: 0946-9240388 & Fax No. 0946-9240390
Email: ebmalakandregion@gmail.com



ORDER

This order will dispose of appeal of Ex-Constable Rahmat Jalil No.17 of Lower Chitral District, in connection with major punishment awarded by the District Police Officer, Lower Chitral vide order No.3652-58/E-II, dated 14-06-2022 i.e. dismissed from service with immediate effect.

Brief facts of the case are that as per complaint of complainant namely Amjad Ali S/O Rahmat Khan R/O Garam Chashma, Lower Chitral, the appellant received bribe of Rs.120,000/- from complainant on the pretext of his appointment/recruitment in police department. The appellant is 06 times previous convicted during his 09 years service. He was given full opportunity and being heard, all legal and codal formalities have been complied with, but during the enquiry he not only failed to negate the charges leveled against him and prove himself innocent rather he confessed his guilt of taking bribe from the complainant and 25 other peoples, total amount of which is 5,312,000/-, on the pretext of their appointment in Chitral Police. Being in Law Enforcing Agency his conduct in criminal activities amounts gross misconduct and condemnable in the eyes of law and has badly affected the image of Police in public. The grounds and objections raised in the appeal by the appellant are totally irrelevant in departmental proceeding and in disciplinary action under Police Rules. Such arguments and grounds are not considerable. The appellant was convicted in light of evidence, facts and circumstance by District Police Officer, Lower Chitral office order No.3652-58/E-II, dated 14-06-2022, as the appellant could not produce any cogent reason in his defense. His case was thoroughly perused and found that he has been proved guilty during the enquiry.

He was called in Orderly Room on 07-09-2022 and heard him in person, but he did not produced any cogent reason to defend the charges leveled against him, therefore, his appeal is hereby rejected.

O.H.C.
For information
27/9/22
District Police Officer
LOWER CHITRAL
Regional Police Officer,
Malakand Region Swat

No. 9963 /E,
Dated 19-9- /2022.

Copy to the District Police Officer, Lower Chitral for information with reference to her office Memo: No.4502/E-II, dated 19-07-2022. His Service Roll and Enquiry file alongwith memory card, received with the Memo: under reference are returned herewith for record in your office.

Encl: S. Roll
Enquiry file
Memory Card.



2407/E
11/08/23

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

1/1

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rules-1975 (amended 2014) submitted Ex-FC Rahmatullah No. 17. The petition was dismissed from service vide Order Endst: No. 3652-58/15-01, dated 14.06.2022, as per complaint of complainant namely Amjad Ali S/O. Rahmat Khan R/O Garam Chashma, Lower Chitral, the appellant received Bribe of Rs. 120,000/- on pretext of his recruitment in Police Department. The appellant is 0 since previous convicted during his 39 years' service. During enquiry the appellant confessed of taking Bribe from 25 other peoples, total amount of which is 5,312,000/- on the pretext of recruiting them in Chitral Police.

The Appellate Authority i.e. Regional Police Officer Malakand rejected his petition vide Order Endst: No. 996/D/E, dated 19.09.2023.

Meeting of Appellate Board was held on 22.06.2023 wherein petitioner was heard in person. Petitioner contended that the amount from the complainant was loan.

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 charge. The Board sees no ground and reasons for acceptance of his petition; therefore, the Board decided that petition is hereby Rejected.

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

No. SI / 2021-2023 / 23, dated Peshawar, the 17-08-2023.

Copy of the above is forwarded to the:

1. Regional Police Officer Malakand, One Service Roll alongwith Inquiry Papers (20 pages) of the above-named Ex-FC received vide your office Memo: No. 14085-86/E, dated 14.12.2022 is returned herewith for your office record.
2. District Police Officer, Lower Chitral.
3. AIG Legal CPO Peshawar.
4. PA to Addl: IGM/HQs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIO/HQs: Khyber Pakhtunkhwa, Peshawar.
6. PA to Registrar CPO Peshawar.
7. Office Supdr: B-IV CPO Peshawar.

5621
17-08-2023

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

No 11069/2023
DE 0108-2023
S: Roll
Enquiry Side
20 pages

Handwritten signatures and dates, including "17/08/2023".

For on (action)
Attest
District Police Officer
CHITRAL

HP LRSRJET FRX 001 4:56PM

**OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA,
PESHAWAR**

ORDER

This under is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa, Police Rule 1975 (amended 20 (4) submitted Ex-FC Rahmat Jalil No. 17. The petitioner was dismissed from service vide order Engst. No. 3652-58/E-11, dated 14.06.2022, as per complaint of complainant namely Amjad Ali S/o Rahmat Khan R/o Garam Chashma. Lower Chitral the appellant received Bribe of Rs.120,000/- on pretext of his recruitment in police department. The appellant is 06 times previous convicted during his 09 years' service. During enquiry the appellant confessed of taking Bribe from 25 other peoples, total amount of which is 5,312,000/- on the pretext of recruiting there is Chitral Police.

The appellant authority i.e Regional Police Officer Malakand rejected his petition vide order Endst No. 9963/1 dated: 19.09.2022.

Meeting of Appellant Boar was held on 22.06.2023 wherein petitioner was heard in person petitioner contended that the amount from the complainant was loan.

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 charged. The Board seen 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. 5/1904.07/23, dated Peshawar, the 21.07.2023

Copy of the above is forwarded to the:

1. Regional Police Officer Malakand, one Service Roll along with Enquiry papers 20 pages of the above named Ex-FC received vide your office Memo No. 14085/80/E dated: 14.12.2012 to returned herewith for your office record.
2. District Police Officer, Lower Chitral.
3. AIG Legal CPO Peshawar.
4. PA to Additional IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to AG/HQrs Khyber Pakhtunkhwa, Peshawar.
6. PA to Registrar CPO Peshawar.
7. Office Supdt E-IV CPO Peshawar.

Dr. Wahed Ullah PSP
AIG/Establishment
For Inspector General of Police
HQrs: Khyber Pakhtunkhwa, Peshawar

04

Annex-E^B

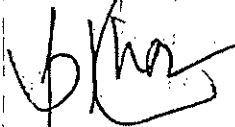
Enquiry No. 13 /E-II
Dated Chitral the 10/05 /2022

CHARGE SHEET

I, Sonia Shamroz Khan (PSP) District Police Officer, Lower Chitral as competent authority, hereby charge you Constable Rahmat Jalil No. 17 posted at Police Station Shoghore on the grounds mentioned below:

That as per complaint of the applicant namely Amjad Ali s/o Rehmat Khan r/o Garum Chashma, Lower Chitral you received bribe of Rs. 120,000/- from the applicant on the pretext of his appointment / recruitment in Police Department. This act is a tantamount of gross misconduct on your part.

1. Based on the above reasons, you appear to be guilty of misconduct/inefficient, not fit for service and have rendered yourself liable to all or any of the penalties specified in Rule -4 of the disciplinary Rules. 1975 amended 2014.
2. You are therefore; required to submit your written reply within seven (07) days of receiving of this Charge Sheet to the Enquiry Officer Mr. Iqbal Karim DSP/HQ Lower Chitral.
3. Your written reply, if any, should reach to 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 Ex-parte action shall follow against you.
4. Intimate as to whether you desire to be heard in person or not?
5. A statement of Allegation is enclosed.


SONIA SHAMROZ KHAN (PSP)
District Police Officer,
Chitral (Lower)

No. 2702-3 /E-II, Dated Lower Chitral the 10 / 05 /2022.
Copies to:-

- ✓ Mr. Iqbal Karim DSP/HQ Lower Chitral for initiating proceeding against the above defaulter official under Police Rule 1975 amended 2014.
2. FC Rahmat Jalil No. 17 posted Police Station Shoghore, C/O SHO PS Shoghore.

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FINAL SHOW CAUSE NOTICE


Whereas you Constable Rahmat Jalil No. 17, Posted Police Station Shoghore, as per complaint of the applicant namely Amjad Ali S/O Rahmat Khan R/O Garum Chashima Chitral Lower you received bribe of RS 120,000/- from the complainant on the pretext of his appointment / recruitment in Police Department. Your this act shows gross misconduct on your part and also badly affects the good name of the department / Police force.

As general Police proceeding you were issued Charge Sheet along with Summary of allegation, vide this office No.2702-03/E-II dated 10.05.2022 and Mr. Iqbal Karim DSP HQ Chitral Lower was appointed as Enquiry Officer.

The Enquiry Officer after proper & impartial enquiry has found you guilty of misconduct and in his finding has recommended you for major punishment.

In light of the above reasons you are issued this final Show Cause Notice to explain as to why you should not be awarded major punishment.

Your written reply if any should reach to the undersigned within (3) days of the receipt of this final show cause notice, otherwise it shall be presumed that you have no defence to put in and in that case an ex-party action shall be taken against you. (Copy of finding report is also attached).


**District Police Officer,
Lower Chitral**

No. 3021-~~12~~ /E-II, dt 27-05-2022

Copy to Constable Rahmat Jalil No. 17 posted Police Station Shoghore C/O SHO PS Shoghore.

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Ammed C³

Enquiry No. 13 E-II,
Dated Chitral the 10/05/2022.

DISCIPLINARY ACTION

I, Sonia Shamroz Khan (PSP), District Police Officer, Lower Chitral as a competent authority am of the opinion that Constable Rahmat Jalil No. 17 has rendered himself liable to be proceeded against departmentally as he has committed the following Acts/Omission as defined in Rule -2(iii) of Police Rule 1975 amended 2014.

STATEMENT OF ALLEGATION


That as per complaint of the applicant namely Amjad Ali s/o Rehmat Khan r/o Garum Chashma, Lower Chitral he received bribe of Rs. 120,000/- from the applicant on the pretext of his (applicant's) appointment / recruitment in Police Department. This act is a tantamount of gross misconduct on his part.

That due to above reasons he has rendered himself liable to proceeding under Police Rules 1975 amended 2014.

For the purpose of scrutinizing the conduct of the said accused with reference to the above allegation Mr. Iqbal Karim DSP/HQ Lower Chitral as Enquiry Officer.

The Enquiry Officer shall conduct proceeding in accordance with provision of Police Rule-1975 amended 2014 and shall provide reasonable opportunity of defense and hearing to the accused official, record his findings and submit report within (14) days of the receipt of this order.

The accused official is bound to ensure his presence during the enquiry proceedings when and where called by the Enquiry Officer.

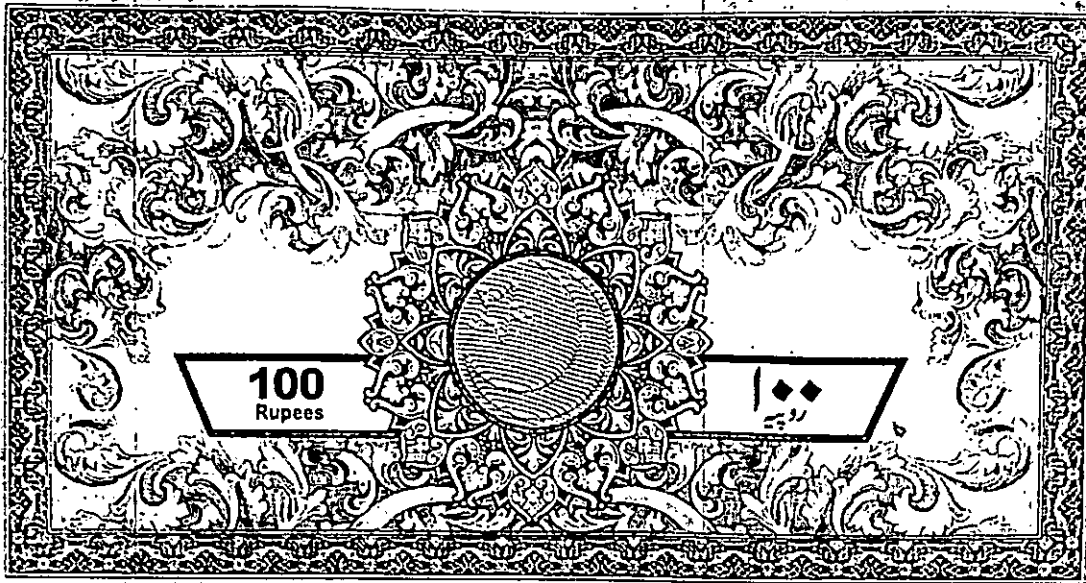

SONIA SHAMROZ KHAN (PSP)
District Police Officer,
Chitral (Lower)

No. 2702-3 /E-II, Dated Lower Chitral the 10/05/2022.

Copies to:-

- ✓ Mr. Iqbal Karim DSP/HQ Lower Chitral for initiating proceeding against the above defaulter official under Police Rule 1975 amended 2014.
2. Constable Rahmat Jalil No. 17 posted PS Shoghore C/O SHO PS Shoghore

G653086



سیران صافی

میر محمد علی ولد ملک خان سکڑا لہر جوگ کھنڈر قصبہ اینڈ ڈسٹرکٹ
 حیدرآباد اینڈ فیملی روکلر ڈپارٹمنٹ کے سٹی لکھنؤ میں واقع
 سکڑا کھنڈر قصبہ فیملی روکلر ڈپارٹمنٹ کے سٹی لکھنؤ میں واقع
 کے زیر سیرا مبلغ 120000 ایک لاکھ بیس ہزار روپے قابل الائنڈ
 سٹی لکھنؤ میں واقع سکڑا کھنڈر قصبہ فیملی روکلر ڈپارٹمنٹ
 کے زیر سیرا میں سے ایک لاکھ بیس ہزار روپے قابل الائنڈ
 سکڑا کھنڈر قصبہ فیملی روکلر ڈپارٹمنٹ کے سٹی لکھنؤ میں
 واقع سکڑا کھنڈر قصبہ فیملی روکلر ڈپارٹمنٹ کے سٹی لکھنؤ
 میں واقع سکڑا کھنڈر قصبہ فیملی روکلر ڈپارٹمنٹ کے سٹی لکھنؤ

سیران صافی
 میر محمد علی ولد ملک خان سکڑا لہر جوگ کھنڈر قصبہ اینڈ ڈسٹرکٹ حیدرآباد

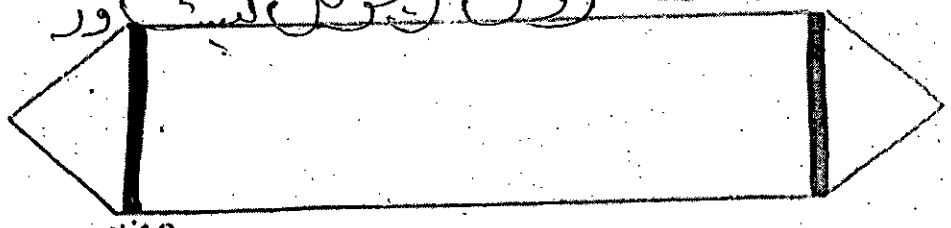
13 مئی 2022

ASB

Mir Muhammad Shah
 Advocate/Oath Commissioner
 Distt. Court Chitral

13-05-2022

بعد التمسوس ٹریبونل لسٹ اور



دکھت و جلیل بنام گولڈن ٹیپ اینڈ بی بی

موردہ
مقدمہ
ذکوئی
جزم

باعث تحریر آئندہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دی وکل کاروائی متعلقہ
آن مقام لسٹ اور کیلئے سید عثمان اللہ شاہ
مقرر کر کے اتر آ کر کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار دیا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار دیا۔ نیز صورت عدم پیروی یا ڈگری یا یک طرفہ یا اپیل کی برآمدگی اور منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانباً التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا ادکالت نامہ لکھ دیا کہ مندر ہے۔

المردوم 18 ماہ 9 2023

عبد اللہ

بمقام لسٹ اور

کے لئے منظور ہے۔

Attested
Accepted

B.C 11172
03349185580

Ghulamullah-Shah@gmail.com
15202-454091157