

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

**Service Appeal No. 1926/2023**

Abdul Haleem Ex-Constable No.867 District Charsadda.

.....Appellant

**V E R S U S**

The Regional Police Officer, Mardan & others

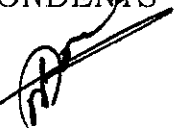
.....Respondents

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Through

RESPONDENTS

  
District Police Officer,  
Charsadda.

NAZIR KHAN

1

**BEFORE THE HONOURABLE, KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL**  
**PESHAWAR**

**Service Appeal No. 1926/2023**

Abdul Haleem Ex-Constable No.867 District Charsadda.

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 9271

Dated: 21/11/23

.....Appellant

**V E R S U S**

The Regional Police Officer, Mardan & others

.....Respondents

**REPLY BY RESPONDENTS NO.1 & 2**

**Respectfully Sheweth: -**

**PRELIMINARY OBJECTIONS**

1. That the appellant has got no cause of action.
2. That the appeal is badly barred by law and limitation.
3. That the appellant has been estopped by his own conduct to file the instant appeal.
4. That the appeal is not maintainable in its present form.
5. That the appellant has not come to the Honourable Tribunal with clean hands.
6. That the appeal is bad for mis-joinder and non-joinder of necessary parties.

**On Facts**

1. Para correct to the extent that appellant while posted as gunner to SHO PS Mandani, reportedly developed links with international drug peddlers and was often seen performing duties in the area in a Fielder Car as well as receiving illegal gratification from smugglers. In this regard he was issued Show Cause Notice reply to which was received and found unsatisfactory (copy of show cause notice & reply are annexed as annexure A&B). Then he was issued Charge Sheet along-with Statement of allegations (copy of charge sheet & Statement of allegation alongwith statements are annexed as Annexure C) and enquiry was conducted through Mr. Sanobar Khan, the then DSP Sardheri (enquiry report is annexed as annexure D). During the course of enquiry, enquiry officer obtained CDR of the appellant whereas he was found to have contact with an International Drug peddler (copy of CDR is annexed as annexure E). Hence, the enquiry officer recommended the appellant for major punishment. Appellant was issued Final Show Cause Notice to which he submitted his reply but the same was found unsatisfactory (copy of Final Show Cause Notice and reply are annexed as annexure F & G), therefore,

he was awarded major punishment of dismissal from service vide O.B No.882 dated 06.07.2023 (copy of dismissal order is annexed as annexure H).

- 2. Para correct to the extent that appellant moved departmental appeal before respondent No.1 but the same was also rejected/filed being devoid of merit. **Copy of departmental appeal and rejection order are annexed as I & J.**
- 3. Each & every Police officer/official is required to perform his duty with honesty and upto the satisfaction of his high ups.
- 4. Incorrect. Clear service record does not provide any indemnity to an officer/official against his misconduct.
- 5. That the appeal of the appellant is liable to be dismissed on the following grounds: -

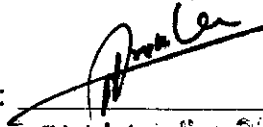
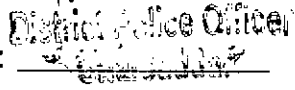
**GROUNDS**

- A. Incorrect. Orders passed by the respondents No.1 & 2 are in accordance with law & rules.
- B. Incorrect. The appellate authority not only perused entire record but also provided opportunity of hearing to the appellant but during the course of personal hearing he could not present any cogent justification to warrant interference in the order, passed by the competent authority.
- C. Incorrect. Before awarding punishment by the competent authority, all legal and codal formalities were adopted.
- D. Para not related.
- E. Incorrect. Appellant was provided ample opportunity by respondent No.1 & 2 in shape of personal hearing in Orderly room but he failed to produce any cogent justification in rebuttal.
- F. Para not related.
- G. Para already explained.
- H. That the respondents seek permission of this Hon'ble Tribunal for further additional grounds at the time of arguments.

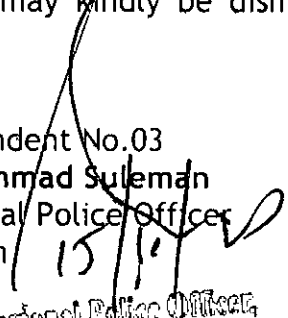

**PRAYER:**

Keeping in view the facts above, it is therefore humbly prayed that the appeal of appellant being without merit and substance, may kindly be dismissed with cost.

Respondent No.02  
Nazir Khan  
District Police Officer  
Charsadda

Sign:   
Stamp: 

Respondent No.03  
Muhammad Suleman  
Regional Police Officer  
Mardan

Sign:   
Stamp:   
Stamp: \_\_\_\_\_

3

Ammerly - A



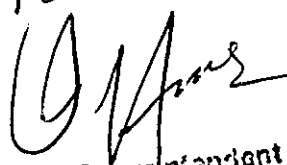
**SHOW CAUSE NOTICE**

I, Muhammad Arif, District Police Officer, Charsadda as competent authority under Police Disciplinary Rules, 1975, do hereby serve you, Constable Haleem No.867, as follow:-

1. You Constable Haleem No. 867 while posted as Gunner SHO PS Tangi reportedly have linkages with International Drugs Peddlers and often witnessed performing duties in the area in a fielder car and receiving kickbacks from smugglers. Your involvements in such corrupt practices are not only against the rules & law but also tarnishing the image of police force. Your act gross to grave misconduct on your part and warrants departmental action against you.
2. Being a responsible police officer, your act is highly objectionable. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalty mentioned under the above mentioned rules.
3. You are therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
4. If no reply to this notice is received within seven 07-days of its delivery in the normal course of circumstances, it shall be presumed that you have no defense to put in and in that case as ex-parte action shall be taken against you.

  
DISTRICT POLICE OFFICER  
CHARSADDA

No. 196 /PA Dated 24/03/2023

Attested  
  
By: Superintendent  
of Police, Legal  
Charsadda



(5)

Annexure - e<sup>2</sup>



OFFICE OF THE  
DISTRICT POLICE OFFICER, CHARSADDA  
PHONE# 091-9220400 FAX#091-9220401  
EMAIL: [charsaddadpo@yahoo.com](mailto:charsaddadpo@yahoo.com)  
CHARGE SHEET UNDER KPK POLICE RULES 1975


I, **Muhammad Arif**, District Police Officer Charsadda, as competent authority hereby charge you FC Haleem No. 867, as follows.


That you FC Haleem No. 867, while posted as Gunner SHO PS Mandani, reportedly have linkages with international Drugs Peddlers and often witnessed performing duties in the area in a fielder car and receiving kickbacks from smugglers. Your involvement in such corrupt practices are not only against the rules & law but also tarnishing the image of police force. In this regard a Show Cause notice has also been issued to you vide No. 196/PA dated 24.03.2023, reply to which was found un-satisfactory. Your act is not only illegal but also contrary to the discipline.

This amounts to grave misconduct on your part, warranting Departmental action against you as defined in section-6(I) (a) of the KPK Police Rules 1975.

1. By reason of the above, you appear to be guilty of misconduct under section 02(III) of the KPK Police Rules 1975 and has render your self liable to all or any of the penalties as specified in section 04 (I) a & b of the said rules.
2. You are therefore, directed to submit your written defense within seven days of the receipt of this Charge Sheet to the Enquiry Officer.
3. Your written defense, if any should reach to the enquiry officer within the specified period, in case of failure, it shall be presumed that you have no defense to put-in and in that case an ex-parte action shall follow against you.
4. Intimate, whether you desired to be heard in person.

Attested

  
Dy. Superintendent  
of Police, Legal  
Charsadda



MUHAMMAD ARIF  
DISTRICT POLICE OFFICER  
CHARSADDA

(6)



OFFICE OF THE  
DISTRICT POLICE OFFICER, CHARSADDA  
PHONE# 091-9220400 FAX#091-9220401  
EMAIL: [charsaddadpo@yahoo.com](mailto:charsaddadpo@yahoo.com)

DISCIPLINARY ACTION UNDER KPK POLICE RULES -1975

I, Muhammad Arif, District Police Officer Charsadda, as competent authority am of the opinion that FC Haleem No. 867, has rendered himself liable to be proceeded against as he has comitted the following acts/omissions within the meaning of section -02 (iii) of KPK Police Rules-1975.

STATEMENT OF ALLEGATIONS

That he FC Haleem No. 867, while posted as Gunner SHO PS Mandani, reportedly have linkages with international Drugs Peddlers and often witnessed performing duties in the area in a fielder car and receiving kickbacks from smugglers. His involvement in such corrupt practices are not only against the rules & law but also tarnishing the image of police force. In this regard a Show Cause notice has also been issued to him vide No. 196/PA dated 24.03.2023, reply to which was found un-satisfactory. His act is not only illegal but also contrary to the discipline.

This amounts to grave misconduct on his part, warranting Departmental action against him.

For the purpose of scrutinizing the conduct of the said official, Mr. DSP Sanobar Khan, is hereby deputed to conduct proper departmental enquiry against the aforesaid official, as contained in section -6 (I) (a) of the afore mentioned rules. The enquiry officer after completing all proceedings shall submit his verdict to this office within (10) days. FC Haleem No.867, is directed to appear before the enquiry officer on the date, time and place fixed by the later (enquiry officer) a statement of charge sheet is attached herewith.

MUHAMMAD ARIF  
DISTRICT POLICE OFFICER  
CHARSADDA

No. 367-68/HC, dated Charsadda the 11/04/2023

CC:

1. Mr. Sanobar Shah Khan DSP Jarekheri (Enquiry Officer)
2. FC Haleem 867(Police Lines)

Attested  
  
By: Superintendent  
of Police, LEG-1  
Charsadda

جو الر حاررہ سٹیٹ بزنس 367-68/HC بار بر دفتر جناب PDP ۵۰ مدہ معروض خدمت ہوں

سر سٹیل تقریباً ۱/۵ ماہ قبل ٹھکانہ ندرن پہلے جو کہ ڈیوٹی سرانجام دے رہا تھا اور سابقہ ۱۴۰۰ فصل دائرہ نماں سال ۱۴۰۰ کھسٹو کھسٹو ڈیوٹی کر رہا تھا جس کے بعد اس نے اور موجودہ ۱۴۰۰ ایمپلائمنٹ سٹا۔ کھسٹو کو بھی ندرن۔ سٹیل نے دونوں ۱۴۰۰ کھسٹو انک موجودگی میں ڈیوٹی سرانجام دی ہے اور کہیں میں بقیہ ۱۴۰۰ ہے۔ ڈیوٹی کیلئے ٹھکانہ سے باہر نہیں نکلے ہیں اور تمام ڈیوٹیاں خواہ چھاپے زنی، نڈ، ہڈی، پاپیٹو سٹ گشتت معالج ڈیوٹی ۱۴۰۰ کھسٹو کے لیے ہیں جس کا موجودہ ۱۴۰۰ ہے۔ ٹھکانہ ندرن اور سابقہ ۱۴۰۰ فصل دائرہ نماں ۱۴۰۰ کھسٹو گواہی میں۔

سٹیل کے مختلف انعام جیک نیٹرز ہوٹا میں گھومنے پھرنے ہیں اور انٹرنیشنل خلیات فروستان کھسٹو مع ہیں یہ سراسر غلط اور بے بنیاد ہے کیونکہ نیٹرز ہوٹا کا ۱۴۰۰ ڈیزر استعمال ہوتا ہے جو بدنام میں گشتت کیلئے استعمال ہوتا ہے۔

سٹیل نے بدنامی کوئی نہیں کیا اور کوئی ایسا غلط کام نہیں اٹھایا ہے جس سے حکم کوئی کی سکو کو نقصان پہنچا ہے۔ اس باب میں عزیزین علامہ سمیت تمام عوام انہماک سے ہیں باہر میں کی جاسکتی ہے۔ اللہ اللہ کوئی نہیں نکلے گا کہ کوئی نہیں دے گا اور سٹیل اللہ اللہ اللہ اللہ بھی بدنامی کوئی کرے گا۔

اللہ عاقل سٹیل کے خلاف جاری کردہ عوارض سٹیل بقیہ کسے کا ڈاکہ داخل دفتر فرما کر سٹیل کا حق دعا گو رہے گا۔

Handwritten signature

سٹیل عبدالعلیم فر ۵۶۷ سالہ ٹھکانہ ندرن سال جولائی ۲۰۲۰

Attested  
Official signature

Legal



(8)

صبا عالی

سلسلہ انٹورٹری اذان کنسٹبل <sup>عبدالکلیم</sup> 867

صروفص قدرت پور کہ مذکورہ کنسٹبل نے

مورخ  $02 \frac{3}{23}$  تا  $23 \frac{3}{23}$  رپورنگز ڈیوٹی

انجام دیا تھا ہے اس دوران مذکورہ کنسٹبل نے  
ضلع فٹہ زبانی نہ تحریر، طور گس، کولی

سنگاپت کی ہے اس دوران مذکورہ کنسٹبل  
کو صوبہ کار سرکار میں دلچسپی دینے دیکھا ہے

یہی مزید بیان ہے

SHO P.S. Mandani

01-6-23

Attested

*[Signature]*  
By: Sub-Inspector  
of Police, Legal  
Department

ComScanner

(9)

میں قریبی عالم خان، جہڑ میں سرکار کے اقرار کر کے دیا ہوں  
میں نے حکم جو کہ عنزی خان میں تصدیق تھا دوران ڈھولی میں  
میں نے خوش اخلاق، ایماندار ڈھولی میں تھا جو لگانے کے الزامات  
میں نے لگانے کے ہیں۔ وہ جھوٹا ہے۔ یہی عمر بیان  
جو حقیقت ہے یہی ہے۔

Asim Khan  
Chairman  
Village Council  
Sur Kamar

0304-1094853

17102-8536306-9

عالم خان، جہڑ میں سرکار

میں نے حکم جو کہ عنزی خان میں تصدیق تھا دوران ڈھولی میں  
میں نے خوش اخلاق، ایماندار ڈھولی میں تھا جو لگانے کے الزامات  
میں نے لگانے کے ہیں۔ وہ جھوٹا ہے۔ یہی عمر بیان  
جو حقیقت ہے یہی ہے۔

Mukamil Shah  
Chairman  
Village Council  
Bar Bohran Dheri

0304-9152597

17101-5354174-9

مکمل شاہ، جہڑ میں سرکار

Attested


[Signature]

By the Superintendent  
of Courts, Legal  
Cherasadda


CamScanner

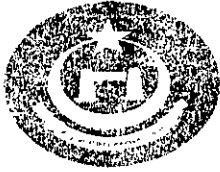
(10)

سکا (رساد علی) نہ چتر میں جمال آباد خوری اقرار کیا گیا  
سوں (میرین) حکیمت قطار خدنی میں انیا ڈیوی خوبی خوش  
اسلوبی، فرہن سنا سی سے انجام دی ہے۔ سزا علی اعاندر  
پولس افتر ہے۔ جس کا جو الزامات لگاے گئے۔ وہ من کفر  
حقوق ہے سنا ہے۔ وہی میر بیان ہو صفت ہے سنا ہے

0346-5267612  Irshad Ali  
Chairman  
VC Jamshabad  
17102-9398210-5

السر  
رساد علی VC میرین جمال آباد

Attested  
  
Notary Public  
Jamshabad



(11)

Annexure - D

Government of Khyber Pakhtunkhwa Office of the  
Sub-Divisional Police Officer Sardheri

No. 292 /S, dated Sardheri the 06/06/2023.

To: District Police Officer,  
Charsadda

Subject: - DEPARTMENTAL ENQUIRY AGAINST CONSTABLE HALEEM NO. 867 OF POLICE STATION MANDANI DISTRICT CHARSADDA.

ALLEGATIONS:

The subject inquiry was referred to this office vide Endst: No. 367-68/HC, dated 11.04.2023 for proceeding under the law with respect to the charges that Constable Haleem No. 867 posted as gunner to SHO PS Mandani, reportedly have linkages with international Drugs Peddlers and often witnessed performing duties in the area in a fielder car and receiving kickbacks from smugglers. His act is highly objectionable and amounts to gross misconduct on his part which warranting departmental action against him.

PROCEEDINGS:

1. The alleged official Constable Haleem No. 867 was summoned to the office of the undersigned, heard in person, he provided his written statement (Place on file as annexure "A") wherein he stated that he was posted 4/5 months ago in Police Station Mandani wherein he was performed his duty as gunner with both SHOs namely Fazal Dawood Khan and Imtiaz Ali Shah, they are the witness of his period, without permission of SHO he did not get out from the Police Station, the fielder car was used by the SHO during the patrolling, he has no linked with international Drug Peddlers and not take any kickbacks from the smugglers, he has a perfect service record, he not taken any wrong step which tarnished the reputation of Police Department. He requested that his departmental inquiry would be filed without any action
2. The undersigned obtained written statement from SHO PS Mandani (Place on file as annexure "B") wherein he stated that FC Haleem No.867 perform duty as gunner with him during the period from 02.03.2023 to 23.03.2023 no complaint received in written/verbally against FC Haleem No.867.
3. As well as the undersigned obtained written statement from the local Chairman's of Sur Kainar, Bar Behram Dheri & Jamalabad (Place on file as annexure "C"D") their statement are also in favour of FC Haleem.
4. A letter was issued to CKC Branch Charsadda to provide CDR of Constable Haleem No. 867 (Place on file as annexure "E"), CDR was obtained through WhatsApp (Place on file as annexure "F") and mobile numbers of prominent Narcotics sellers of PS Mandani area have been obtained (Place on file as annexure "G"), Mobile numbers of alleged official was checked in the available CDR which reveals that the official connection with prominent international Drugs Peddlers Yasceen r/o Bari Band Mandani, he contacted

*Attested*  
*Officer*  
Dy: S/O  
of Police, Leg-1  
Charsadda

many times from his cell phone# 0334-9033109 to Yascen having Cell Phone No.0343-9812356 as highlighted at annexure "H".

CONCLUSION AND RECOMMENDATIONS:

In view of above circumstances and stated facts, the undersigned reach to the conclusion that sources as well as CDR reveals that FC Haleem No.867 is involved in corrupt practices having connection with international Drugs Peddlers. Besides this, the official performed duty only at circles Tangi.

The allegation levelled against FC Haleem No. 867 has been proved, therefore, he may be awarded "**Major Punishment**" under the Police Rules, please.

Enclosed: (62 Pages)

*[Signature]*  
Sub-Divisional Police Officer,  
Sardheri

A-C  
issue him F.S.C.N

*[Signature]*  
1110 PO Chadda  
06-06-2023

A/C  
He is awarded  
"Major Punishment"  
of Dismissal from service  
with immediate effect.

*[Signature]*  
6/7/23

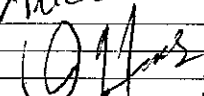
Attested  
*[Signature]*  
By: Superintendent  
of Police, Legal  
Charsadda

13

Annexure - E

|        |               |
|--------|---------------|
| Number | 923349033109  |
| Name   | Haleem        |
| CNIC   | 4250190802267 |

| A Party      | B Party    | Call Type      | Duration | Date & Time     | IMEI            | Location                      | Cell Id    | Latitude | Longitude |
|--------------|------------|----------------|----------|-----------------|-----------------|-------------------------------|------------|----------|-----------|
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/8/2023 15:49  | 359392244080980 | Mandani - MANDANI             | 5225018693 | 34.3454  | 71.78797  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/8/2023 15:57  | 359392244080980 | Mandani - MANDANI             | 5225018693 | 34.3454  | 71.78797  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/8/2023 16:03  | 359392244080980 | Mandani - MANDANI             | 5225018693 | 34.3454  | 71.78797  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/8/2023 16:04  | 359392244080980 | Mandani - MANDANI             | 5225018693 | 34.3454  | 71.78797  |
| 923349033109 | 3439812356 | OUTGOING VOICE | 1        | 1/9/2023 11:58  | 359392244080980 | Tangi - TANGI                 | 5225015240 | 34.3031  | 71.65142  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/10/2023 9:13  | 359392244080980 | Tangi Bus Stand - TANGI       | 5225032373 | 34.29598 | 71.65087  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/10/2023 10:41 | 359392244080980 | Tangi Bus Stand - TANGI       | 5225032373 | 34.29598 | 71.65087  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/10/2023 10:41 | 359392244080980 | Tangi Bus Stand - TANGI       | 5225032373 | 34.29598 | 71.65087  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/10/2023 11:02 | 359392244080980 | Tangi Bus Stand - TANGI       | 5225032373 | 34.29598 | 71.65087  |
| 923349033109 | 3439812356 | OUTGOING VOICE | 0        | 1/10/2023 11:08 | 359392244080980 | Tangi Bus Stand - TANGI       | 5225032373 | 34.29598 | 71.65087  |
| 923349033109 | 3439812356 | OUTGOING VOICE | 0        | 1/10/2023 11:22 | 359392244080980 | Tangi Bus Stand - TANGI       | 5225022373 | 34.29598 | 71.65087  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/10/2023 19:38 | 359392244080980 | Tangi Bus Stand - TANGI       | 5225032373 | 34.29598 | 71.65087  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/11/2023 18:10 | 359392244080980 | Marghan - MARGHAN             | 5225024141 | 34.35426 | 71.75772  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/12/2023 12:15 | 359392244080980 | Dhakki - DHAKKI               | 5225028692 | 34.30461 | 71.77496  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/13/2023 14:10 | 359392244080980 | Koz Behram Dheri - CHARSADDA  | 5225034263 | 34.3889  | 71.75289  |
| 923349033109 | 3439812356 | OUTGOING SMS   | 0        | 1/13/2023 14:11 | 359392244080980 | Koz Behram Dheri - CHARSADDA  | 5225034263 | 34.3889  | 71.75289  |
| 923349033109 | 3439812356 | OUTGOING SMS   | 0        | 1/13/2023 14:19 | 359392244080980 | Koz Behram Dheri - CHARSADDA  | 5225034263 | 34.3889  | 71.75289  |
| 923349033109 | 3439812356 | OUTGOING VOICE | 1        | 1/13/2023 16:58 | 359392244080980 | Mandani - MANDANI             | 5225018693 | 34.3454  | 71.78797  |
| 923349033109 | 3439812356 | OUTGOING VOICE | 0        | 1/15/2023 11:51 | 359392244080980 | Mandani - MANDANI             | 5225018693 | 34.3454  | 71.78797  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/15/2023 11:54 | 359392244080980 | Mandani - MANDANI             | 5225018693 | 34.3454  | 71.78797  |
| 923349033109 | 3439812356 | OUTGOING VOICE | 0        | 1/15/2023 12:02 | 359392244080980 | Mandani - MANDANI             | 5225018693 | 34.3454  | 71.78797  |
| 923349033109 | 3439812356 | OUTGOING VOICE | 2        | 1/15/2023 12:17 | 359392244080980 | Mandani - MANDANI             | 5225018693 | 34.3454  | 71.78797  |
| 923349033109 | 3439812356 | OUTGOING VOICE | 0        | 1/15/2023 12:29 | 359392244080980 | Mandani - MANDANI             | 5225018693 | 34.3454  | 71.78797  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/15/2023 12:29 | 359392244080980 | Mandani - MANDANI             | 5225038693 | 34.3454  | 71.78797  |
| 923349033109 | 3439812356 | OUTGOING VOICE | 0        | 1/15/2023 12:30 | 359392244080980 | Mandani - MANDANI             | 5225038693 | 34.3454  | 71.78797  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/15/2023 12:43 | 359392244080980 | N/A - HISARA NEHRI            | 5225024270 | 34.32343 | 71.75872  |
| 923349033109 | 3439812356 | OUTGOING VOICE | 0        | 1/16/2023 19:18 | 359392244080980 | Mandani - MANDANI             | 5225018693 | 34.3454  | 71.78797  |
| 923349033109 | 3439812356 | OUTGOING VOICE | 4        | 1/18/2023 10:21 | 359392244080980 | N/A - HISARA NEHRI            | 5225024270 | 34.32343 | 71.75872  |
| 923349033109 | 3439812356 | INCOMING VOICE | 1        | 1/19/2023 10:47 | 359392244080980 | N/A - HISARA NEHRI            | 5225024270 | 34.32343 | 71.75872  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/26/2023 19:20 | 359392244080980 | Dhakki - DHAKKI               | 5225018692 | 34.30461 | 71.77496  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/26/2023 22:08 | 359392244080980 | Marghan - MARGHAN             | 5225024141 | 34.35426 | 71.75772  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/27/2023 10:21 | 359392244080980 | Marghan - MARGHAN             | 5225024141 | 34.35426 | 71.75772  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/29/2023 9:53  | 359392244080980 | N/A - HISARA NEHRI            | 5225014270 | 34.32343 | 71.75872  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/29/2023 9:53  | 359392244080980 | Marghan - MARGHAN             | 5225024141 | 34.35426 | 71.75772  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/30/2023 10:27 | 359392244080980 | N/A - ZIARAT KALAY            | 5225025089 | 34.30725 | 71.63286  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/30/2023 10:27 | 359392244080980 | N/A - ZIARAT KALAY            | 5225025089 | 34.30725 | 71.63286  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/31/2023 9:43  | 359392244080980 | Tangi Bus Stand - TANGI       | 5225032373 | 34.29598 | 71.65087  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/31/2023 10:20 | 359392244080980 | N/A - ZIARAT KALAY            | 5225025089 | 34.30725 | 71.63286  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/31/2023 10:32 | 359392244080980 | N/A - ZIARAT KALAY            | 5225025089 | 34.30725 | 71.63286  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 1/31/2023 10:36 | 359392244080980 | N/A - ZIARAT KALAY            | 5225025089 | 34.30725 | 71.63286  |
| 923349033109 | 3439812356 | OUTGOING VOICE | 0        | 1/31/2023 10:47 | 359392244080980 | N/A - ZIARAT KALAY            | 5225025089 | 34.30725 | 71.63286  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 2/1/2023 11:11  | 359392244080980 | Zaim - ZAIM                   | 5225022387 | 34.30012 | 71.72212  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 2/5/2023 17:13  | 359392244080980 | Showdag Charsadda - CHARSADDA | 5225014268 | 34.35049 | 71.72249  |
| 923349033109 | 3439812356 | INCOMING VOICE | 0        | 2/5/2023 17:18  | 359392244080980 | Showdag Charsadda - CHARSADDA | 5225014268 | 34.35049 | 71.72249  |
| 923349033109 | 3439812356 | OUTGOING SMS   | 0        | 2/5/2023 19:26  | 359392244080980 | Mandani - MANDANI             | 5225018693 | 34.3454  | 71.78797  |

Attested  
  
 Dy: Superintendent  
 of Police, Legal  
 Charsadda

14

|              |            |                |   |                 |                 |                              |            |          |          |
|--------------|------------|----------------|---|-----------------|-----------------|------------------------------|------------|----------|----------|
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/5/2023 19:33  | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/8/2023 9:51   | 359392244080980 | Tangi Bus Stand - TANGI      | 5225032373 | 34.29598 | 71.65087 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/11/2023 10:22 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/11/2023 10:22 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/11/2023 10:23 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/16/2023 11:23 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/16/2023 21:21 | 359392244080980 | Zaim - ZAIM                  | 5225022387 | 34.30012 | 71.72212 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/16/2023 21:21 | 359392244080980 | Zaim - ZAIM                  | 5225022387 | 34.30012 | 71.72212 |
| 923349033109 | 3439812356 | OUTGOING SMS   | 0 | 2/16/2023 21:22 | 359392244080980 | Zaim - ZAIM                  | 5225022387 | 34.30012 | 71.72212 |
| 923349033109 | 3439812356 | OUTGOING SMS   | 0 | 2/16/2023 21:25 | 359392244080980 | Dhakki - DHAKKI              | 5225018692 | 34.30461 | 71.77496 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/16/2023 21:26 | 359392244080980 | Dhakki - DHAKKI              | 5225018692 | 34.30461 | 71.77496 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/17/2023 11:50 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | OUTGOING SMS   | 0 | 2/17/2023 11:59 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 1 | 2/17/2023 11:59 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 1 | 2/17/2023 20:43 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/17/2023 21:06 | 359392244080980 | Mandani - MANDANI            | 5225038693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/17/2023 22:40 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/17/2023 22:46 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/17/2023 22:55 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/17/2023 23:09 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/17/2023 23:10 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/17/2023 23:11 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/17/2023 23:15 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/17/2023 23:54 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | OUTGOING VOICE | 0 | 2/18/2023 11:20 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 1 | 2/18/2023 18:23 | 359392244080980 | Marghan - MARGHAN            | 5225024141 | 34.35426 | 71.75772 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/18/2023 18:29 | 359392244080980 | Marghan - MARGHAN            | 5225014141 | 34.35426 | 71.75772 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/18/2023 18:35 | 359392244080980 | Koz Behram Dheri - CHARSAJDA | 5225034263 | 34.3889  | 71.75289 |
| 923349033109 | 3439812356 | INCOMING VOICE | 1 | 2/22/2023 12:26 | 359392244080980 | Mandani - MANDANI            | 5225018693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/25/2023 16:12 | 359392244080980 | Koz Behram Dheri - CHARSAJDA | 5225024263 | 34.3889  | 71.75289 |
| 923349033109 | 3439812356 | OUTGOING SMS   | 0 | 2/25/2023 16:13 | 359392244080980 | Koz Behram Dheri - CHARSAJDA | 5225024263 | 34.3889  | 71.75289 |
| 923349033109 | 3439812356 | OUTGOING SMS   | 0 | 2/26/2023 10:35 | 359392244080980 | Mandani - MANDANI            | 5225038693 | 34.3454  | 71.78797 |
| 923349033109 | 3439812356 | INCOMING VOICE | 0 | 2/26/2023 10:36 | 359392244080980 | Mandani - MANDANI            | 5225038693 | 34.3454  | 71.78797 |

*Attended*  
*Officer*  
**Dy: Superintendent**  
**of Police, Local**  
**Charsajda**



Annexure F

**FINAL SHOW CAUSE NOTICE**

Whereas, the charge of corrupt practices was referred to enquiry officer for General Police Proceedings, contained u/s 5(3) Police Rules 1975.

AND

Whereas, the enquiry officer has submitted his findings, recommending you for Major Penalty.

AND

Whereas, I am satisfied with the recommendation of the enquiry officer that you FC Haleem No. 867, while posted as Gunner SHO PS Mandani, reportedly have linkages with international Drugs Peddlers and often witnessed performing duties in the area in a fielder car and receiving kickbacks from smugglers. Your involvement in such corrupt practices are not only against the rules & law but also tarnishing the image of police force. In this regard a Show Cause notice has also been issued to you vide No. 196/PA dated 24.03.2023, reply to which was found un-satisfactory. Your act is not only illegal but also contrary to the discipline.

2. Thus the act amounts to gross misconduct and renders you liable for punishment, under Police Rules 1975.

3. Therefore, I, Muhammad Arif, District Police Officer, Charsadda in exercise of the powers vested in me under rules 5(3) (a) (b) of Police Rules 1975, call upon you to explain as to why the proposed punishment may not be awarded to you.

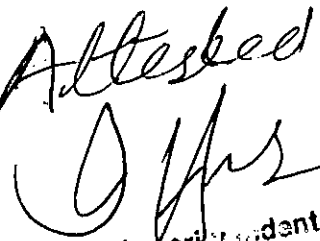
4. Your reply should reach the undersigned within 07-days of receipt of this notice, failing which disciplinary action pertaining to your dismissal from service will be taken ex-parte.

5. You are at liberty to appear in person before the undersigned for personal hearing.

  
DISTRICT POLICE OFFICER  
CHARSADDA

No. 858 /HC

Dated 08/06 /2023

  
Dy. Superintendent  
of Police, Legal  
Charsadda



جوالم نائنٹل شوکار لٹریچر میں حجازی جناب ڈی پی اے جناب  
 چارسدہ سروسز خدمت میں تھیں ان میں دوران  
 انڈیا میں جو بیان ہے وہ انڈیا میں افریقہ میں کو دیا ہے جس میں اس  
 میں کسی قسم کی رد و بدل نہیں کرنا چاہتا ہوں۔ لہذا وہی  
 حیرا بیان تاہم صحافی کا طلبکار ہوں۔ صحافی دی جاؤ گے۔  
 اور انڈیا میں نائنٹل لٹریچر میں فریڈم اور  
 فریڈم میں۔ سائنس تاہم حیات دعا گو رہیں گے۔

الکافی

867 قیصر ڈیوی ڈیوی ڈیوی ڈیوی  
 الیکٹرانکس ڈیوی ڈیوی ڈیوی ڈیوی

He  
 Call him for  
 personnel hearing on  
 Monday 19.06.2023.  
 at 11:30 a.m.

Attested  
 Officer

Dy: Superintendent  
 of Police, Legal  
 Charsadda

Dy: Superintendent  
 18/6/23


**ORDER**

This order will dispose of the departmental enquiry against FC Haleem No. 867, while posted as Gunner SHO PS Mandani, reportedly have linkages with international Drugs Peddlers and often witnessed performing duties in the area in a fielder car and receiving kickbacks from smugglers. His involvement in such corrupt practices are not only against the rules & law but also tarnishing the image of police force. In this regard a Show Cause notice has also been issued to him vide No. 196/PA dated 24.03.2023, reply to which was found un-satisfactory. His act is not only illegal but also contrary to the discipline.

On the above allegation he was issued Charge Sheet together with statement of allegations under, Section 5 Sub Section 3 of Police Rules 1975 and Mr. Sanober Shah Khan DSP Sardheri was nominated as inquiry officer for probing into the matter by conducting departmental inquiry against him and he after fulfillment of all codal formalities has submitted his findings.

Subsequently, FC Haleem No. 867, was issued Final Show Cause Notice U/S 5(3) Police Rules 1975 reply to which was received but found un-satisfactory

After perusal of the enquiry papers & recommendation of the enquiry officer and hearing him in person in orderely room, the undersigned reached to the conclusion that the delinquent official has nothing to put in his defense and to show his innocence. Hence he is hereby awarded the Major Punishment of dismissal from service with immediate effect.

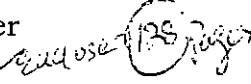
  
(Muhammad Arif) PSP  
DISTRICT POLICE OFFICER  
CHARSADDA

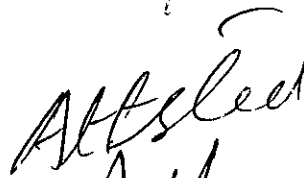
O.B No 882

Date 06/07/2023

No. 1031-34 /HC, dated Charsadda the 07/07/2023

CC.

Pay Officer  
EC/FMC   
I/C Lab

  
District Police Officer  
of Police, Charsadda

محرمین ۱۳۶۱ھ مطابق ۱۹۴۲ء

درخواست لبرادہ سروس بحالی

جناب عالی!

درخواست بحالہ اور پیسیدہ سائل ضلع چارسدہ کارپالشن سے اور نیابت غیر میٹرو  
سے تعلق رکھتا ہے۔ سائل سال ۱۹۴۲ء میں بطور کسٹبل محکمہ پولیس میں بوقت ہی تھا اور اپنی  
نوٹری نیابت ایمانداری کیساتھ اپنی ڈیوٹی سرانجام دی ہے۔ سائل دو ان ملک ازمنہ بطور گن میں  
مختلف ۱۹۴۵ء کیساتھ ڈیوٹی سرانجام دے چکا ہے۔ اور گن کسپنر میں (نقص) محنت کی بدولت  
محکمہ پولیس کو مامیابی لیں ملی ہے۔

سائل بسلسلہ انٹرویو بحوالہ O.B. No. 882  
06-07-2023 نوٹری سے درخواست کی جاتی ہے۔ (نقل پھرا لہنہ)  
بذریعہ درخواست استرجاع ہے کہ سائل کو اپنی بے گناہی ثابت کرنا اور حکمانہ اپیل  
جمع کرنے کا حکم صادر فرمائے مسئلہ فرمائیں۔

سائل آریبل ٹیس کرنے کے تاحیات دعا کرتا ہے۔

العارضی

آپ کا تابع فرمان EX کسٹبل احلیم 867 ضلع چارسدہ

9033109 - 0334

Attested  
[Signature]  
G. S. [Name]

Better copy

محکمہ جناب DIG صاحب مردان رحمن

درخواست برآمد۔ سروس بحالی

جناب عالی!

درخواست بحضور انور یہ ہے کہ سائل ضلع چارسدہ کا رہائشی ہے اور نہایت غریب گھرانے سے تعلق رکھتا ہے۔  
سائل 20122ء میں بطور کانسٹیبل محکمہ پولیس میں بھرتی ہوا تھا اور اپنی نوکری نہایت ایمانداری کے ساتھ اپنی  
ڈیوٹی سر انجام دی ہے۔ سائل دوران ملازمت بطور گن مین مختلف SHO کے ساتھ ڈیوٹی سر انجام دے چکا ہے  
۔ اور کئی کیسز میں اچھک محنت کی بدولت محکمہ پولیس کو کامیابی بھی ملی ہے۔

سائل بسلسلہ انکوائری بحوالہ OB.No.8802/06.07.2023 نوکری سے برخاست ہو چکا ہے (نقل

بہمراہ لف ہے) بذریعہ درخواست استدعا ہے کہ سائل کو اپنی بے گناہی ثابت کرنے اور محکمہ پولیس میں جمع کرانے کا  
حکم صادر فرما کر مشکور فرمائیں۔

سائل اپنی طبی عمر کے لیے تاحیات دعا گو رہے گا۔

العارض

آپ کا تابع فرمان Ex کانسٹیبل حلیم 867 ضلع چارسدہ

Attested  
Signature

0334-9033109

ORDER.

This order will dispose-off the departmental appeal preferred by Ex-Constable Haleem No. 867 of Charsadda District Police against the order of District Police Officer, Charsadda, whereby he was awarded major punishment of dismissal from service vide OB: No. 882 dated 06.07.2023. The appellant was proceeded against departmentally on the allegations that he while posted as Gunman with SHO Police Station Mandani, reportedly has linkages with International Drugs Peddlers and often witnessed performing duties in the area in a fielder car and receiving kickbacks from smugglers. His involvement in such like corrupt practices is not only against the rules and law but also tarnishing the image of Police Force.

In this regard a Show Cause notice was issued to him to which his reply was received/perused by the District Police Officer, Charsadda and found unsatisfactory.

Therefore, Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of Allegations and the then Sub Divisional Police Officer, (SDPO) Sardheri, Charsadda was nominated as Enquiry Officer. The Enquiry Officer after fulfilling codal formalities submitted his findings to District Police Officer, Charsadda, wherein he held responsible the delinquent Officer and recommended him for major punishment.

He was issued Final Show Cause Notice to which his reply was received and found unsatisfactory.

After perusal of the enquiry papers and recommendation of the enquiry Officer, the District Police Officer, Charsadda heard the delinquent Officer in Orderly Room wherein he failed to produce any cogent reason in his defense. Therefore, he was awarded major punishment of dismissal from service vide OB: No. 882 dated 06.07.2023 by the District Police Officer, Charsadda.

Feeling aggrieved from the order of District Police Officer, Charsadda, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 30.08.2023.

From the perusal of the enquiry file and service record of the appellant, it has been found that allegations leveled against the appellant have been proved and he could not produce any cogent justification in rebuttal rather the allegations of malpractices and corruption stand proved beyond any shadow of doubt. Being a

Attested

*[Signature]*

Dy: Superintendent  
of Police, Leg II  
Charsadda

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member of disciplined/uniformed force, the involvement of the delinquent Officer in such like malpractices and corrupt activities brought a bad name for entire Police force in the eyes of general public, besides affecting other members of Police force. Hence, the retention of appellant in Police Department will stigmatize the prestige of entire Police Force. Besides, during the course of personal hearing, he could not present any cogent justification to warrant interference in the order passed by the competent authority. Hence, the very conduct of appellant is unbecoming of a disciplined Police Officer. Therefore, the order passed by the competent authority does not warrant any interference.

Keeping in view the above, I, Muhammad Suleman, PSP Regional Police Officer, Mardan, being the appellate authority, find no substance in the appeal, therefore, the same is rejected and filed, being devoid of merit.

Order Announced.

(MUHAMMAD SULEMAN) PSP  
Regional Police Officer,  
Mardan.

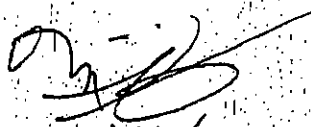
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No. 1001 /ES, Dated Mardan the 12/09/2023  
Copy forwarded to District Police Officer, Charsadda, for information and necessary action w/r to his office Memo: No: 1866/EO dated 25.07.2023. His Service Record is returned herewith.

(\*\*\*\*\*)

EC  
For action

Attested  
Official

  
OPD/Chd.  
13-9-23

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
OFFICE OF THE DISTRICT POLICE OFFICER CHARSADDA  
PHONE# 091/9220400 FAX# 091-9220401  
EMAIL: [charsaddadpo@yahoo.com](mailto:charsaddadpo@yahoo.com)

AUTHORITY IN SERVICE APPEAL No.1926/2023 TITLED ABDUL HALEEM (EX-CONSTABLE) VS RPO/MARDAN ETC.

Mr. Ijaz Hussain, Deputy Superintendent of Police, Legal Charsadda, is hereby authorized to appear before the Honorable Service Tribunal, Peshawar in the above captioned Service Appeal on behalf of answering respondents. He is also authorized to submit all required documents and replies etc as representative of the answering respondents through the Additional Advocate General, Khyber Pakhtunkhwa Peshawar.

Respondent No.02  
Nazir Khan  
District Police Officer  
Charsadda

Sign: \_\_\_\_\_  
Stamp: District Police Officer  
Charsadda

Respondent No.03  
Muhammad Suleman  
Regional Police Officer  
Mardan  
Regional Police Officer,  
Mardan

Sign: \_\_\_\_\_  
Stamp: \_\_\_\_\_

BEFORE THE HONOURABLE KPK SERVICES TRIBUNAL PESHAWAR

Service Appeal No. 1926/2023

Abdul Haleem Ex-Constable No.867 District Charsadda.

.....Appellant

**V E R S U S**

The Regional Police Officer, Mardan & others

.....Respondents

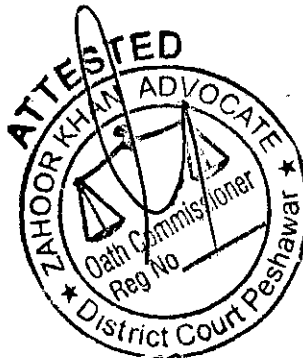
AFFIDAVIT

I, Ijaz Hussain, Deputy Superintendent of Police, Legal (representative of the department) do hereby solemnly affirm and declare on Oath that contents of the parawise comments are true and nothing has been concealed 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 has been struck off.

Respondent No.02  
Nazir Khan  
District Police Officer  
Charsadda

Sign: \_\_\_\_\_  
District Police Officer  
Stamp: \_\_\_\_\_  
Charsadda.



21/11/23

Respondent No.03  
Muhammad Saleem  
Regional Police Officer  
Mardan

Sign: \_\_\_\_\_  
Regional Police Officer,  
Mardan  
Stamp: \_\_\_\_\_