

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.

Appeal No. 1711/2023

Khyber Pakhtunkhwa
Service Tribunal

Niaz Ali Khan

Diary No. 9876 (Appellant)

VERSUS

Dated 13/12/23 (Respondents)

Addl. IGP etc.

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[Signature]
DEPONENT

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

Niaz Ali Khan

(Appellant)

VERSUS

Addl. IGP etc.

(Respondents)

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NO.1 & 2

Respectfully Sheweth

The respondents respectfully submit as under: -

PRELIMINARY OBJECTIONS.

1. That the Appellant has got no cause of action.
2. That the Appeal is not maintainable under the law.
3. That the Appeal is barred by law & limitation.
4. That the Appellant has not been discriminated in any way.
5. That the Appeal is bad due to mis-joinder and non-joinder of necessary parties.
6. That the Appellant has approached the Honorable Tribunal with unclean hands.
7. That the Appellant has got no cause of action and locus-standi to file the instant Appeal.
8. That the Appellant has been estopped by his own conduct.

BRIEF FACTS:

1. Pertain to record.
2. Correct to the extent, that the appellant was deployed as IHC/MHC in PS Kakki Bannu, but rest of para is incorrect. On papers/record FC Ihsan Ullah No.53 was appointed as cook constable but in real, a Tabedaar uncle was hired on Rs.8000/ salary per month by FC Ihsan Ullah for performing duty as cook of the concern Police Station.(show cause notice is annexed)
3. Pertain to record.
4. Incorrect, his reply to the show cause was found un-satisfactory. Muharrar is a responsible officer of a Police Station. It is the duty of Muharrar to issue duty roaster in concerned Police station.
5. Incorrect, when the charges leveled against the appellant were proved. thus the order of reversion from the Rank of IHC to LHC was issued.(Reversion order is annexed)
6. Correct to the extent, that the appellant submitted a departmental Appeal before W/RPO Bannu but it was rejected being devoid of merit.
7. Pertain to record.

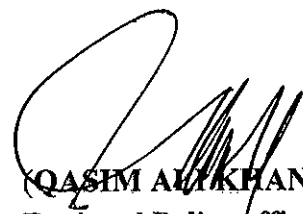
GROUND:

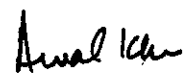
- A. Incorrect, the impugned order of reversion into Lower Rank was issued according to law, rules and policy and cannot be set aside.
- B. Incorrect, both the impugned orders are sustainable in the eye of law.
- C. Pertain to record.
- D. Incorrect, proper and departmental enquiry was conducted in which all the charges leveled against the appellant were proved. Nothing has been done unfair to the appellant. He was treated in accordance with law, rules and Policy.(Departmental Enquiry is annexed)
- E. Incorrect, all process of law has been followed and no discrimination has been committed by the respondents.
- F. Incorrect, no violation of Article 10 (A) has been committed. Every step taken against the appellant was according to law, rules and policy.

- G. Incorrect, departmental enquiry was conducted in which all the charges against the appellant were proved. Moreover, the appellant was heard in person during hearing appellant failed to advance any plausible in rebuttal of the charges. (Department enquiry is annexed)
- H. Incorrect, in charge of the police station was unaware of the instant matter and it is the responsibility of Muharrar to bring such matter in the notice of his high-ups.
- I. The Respondent Department may kindly be allowed to raise additional Grounds at the time of arguments.

PRAYER:

In view of the above Para wise comments, it is most humbly prayed that the Petition of the Petitioner may kindly be dismissed with cost.


(QASHIM ALI KHAN)
Regional Police officer
Bannu Region, Bannu
(Respondent No.2)


(AWAL KHAN) PSP
Addl. IGP of Police HQrs,
KP Peshawar.
(Respondent No.1)

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

Appeal No. 1711/2023

Niaz Ali Khan

(Appellant)

VERSUS


Addl. IGP etc.

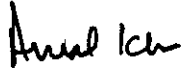
(Respondents)

AUTHORITY LETTER.

Mr. Muhammad Farooq Khan DSP Legal Bannu, is hereby authorized to appear before Honorable Tribunal on behalf of the undersigned in the above cited Appeal.

He is authorized to submit and sign all documents pertaining to the present Appeal.


(QASIM ALI KHAN) PSP
Regional Police officer
Bannu Region, Bannu
(Respondent No.2)


(AWAL KHAN) PSP
Addl. IGP of Police HQrs,
KP Peshawar.
(Respondent No.1)

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BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.

Appeal No. 1711/2023

Niaz Ali Khan

(Appellant)

VERSUS

Addl. IGP etc.

(Respondents)

AFFIDAVIT.

I MR. Muhammad Farooq Khan DSP Legal Bannu, representative for Respondent Nos.1 to 2 , do hereby solemnly affirm and declare that the contents of the accompanying comments submitted by us are true and correct to the best of our knowledge and belief and that nothing has been concealed from this Honorable Tribunal.

It is further submitted on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defence has been struck off/cost.

*Awal Khan PSP
Addl. IGP of Police HQ
KP, Peshawar*

[Signature]
DEPONENT

[Signature]
ATTESTED
Muhammad Raza Khan, Notary
Date: _____
High Court Peshawar

*Awal Khan PSP
Ad*

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 1711 /2023


Niaz Ali Khan APPELLANT

VERSUS


Additional IGP & others. RESPONDENTS

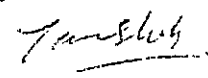
I N D E X

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Through Appellant 

Arshad Ali Nowsherwi
Advocate Supreme Court
of Pakistan

& 
Amjad Nawaz
Advocate, Peshawar.

Tahir shah Advocate


①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2023

Niaz Ali Khan S/o Khan Wali Khan *Ex. IHC Now*
LHC/2013 Police Station Dadi Wala Unit Investigation
District Lakki Marwat.
R/o Mohalla Sari Khel, Sarai Naurang,
District Lakki Marwat.

..... APPELLANT

VERSUS

1. Additional Inspector General of Police,
Headquarters, Khyber Pakhtunkhwa, Peshawar.
2. Regional Police Officer, Bannu Region, Bannu.

..... RESPONDENTS

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT,
1974 AGAINST THE IMPUGNED ORDER DATED
21.07.2023, OF RESPONDENT NO.1, IN BACKING
OF THE EARLIER DEPARTMENTAL ORDER
DATED: 27.03.2023 PASSED BY RESPONDENT
NO.2, THE APPELLANT WAS AWARDED
PUNISHMENT OF REVERTED TO A LOWER RANK
WITH IMMEDIATE EFFECT, HENCE BOTH THE
ABOVE IMPUGNED ORDERS OF RESPONDENT
NO.1 & 2 RESPECTIVELY, ARE ILLEGAL IN
NATURE, UNLAWFUL, AGAINST THE FACTS AND
CIRCUMSTANCES OF THE CASE OF APPELLANT,
THEREFORE LIABLE TO BE SET AT NAUGHT.

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Respectfully Sheweth:

1. That appellant joined the respondents' Department as a Constable on 10.07.2002, performing his duties with zeal & zest, with utmost satisfaction of his superior authorities throughout comprising of the over & above 21 years.
2. That on 05.10.2022, appellant was deployed at police station Kaki as IHC/MHC, whereby just to avoid any unpleasant situation, due to the reasons of refreshment and food of the official of police station, the arrangement of the cook, is acquired by the SHO concern, and Mr. Ihsanullah FC 53, appointed by the office of RPO Bannu as Cook Constable.
3. The alleged allegation surprisingly firstly reveal to the appellant vide served Show Cause Notice dated: 12.01.2023, according to which, allegation leveled against the appellant in the alleged manner, about specifying the hand on glove with the above appointed Cook Constable, as the said Cook left his duty without intimation to his superior officers by replacing his substitute named "Tabidar" Private Person, the alternate Cook, so in this very strange contention, appellant was proceeded accordingly rather departmentally. (COPY OF THE SHOW CAUSE NOTICE IS ANNEXED)
4. That on 19.01.2023, In reply of the initially served Show Cause Notice, appellant categorically denied the contention raised in the Show Cause Notice.

(8)

with the special stance that since appellant is a constable rank police official, having nothing to do with the working priorities of any such rank official. as it is the progrative as priority of the incharge police station, and in this respect it is believed in factual as well as in legal form that the services of the appellant cannot be held liable for the same.

(COPY OF THE REPLY OF SHOW CAUSE NOTICE IS ANNEXED)

5. That the thereafter taken departmentally, under the flow of departmental proceedings against the appellant, and consequently the respondent No.2 vide his impugned order dated: 27.03.2023 punished to the appellant for reverted to a Lower Rank. (COPY OF THE INITIALLY PASSED IMPUGNED ORDER OF RESPONDENT NO.2 IS ANNEXED HEREWITH)
6. Aggrieved with the above initial order of respondent No.2, appellant preferred an appeal dated: 11.04.2023 before the respondent No.1, which was also with the same result vide impugned order dated: 21.07.2023. (COPY OF THE IMPUGNED ORDER OF RESPONDENT NO.1 IS ALSO ANNEXED HEREWITH)
7. That dissatisfied with both the impugned orders of respondent No.1 & 2 respectively, appellant is invoking appellate jurisdiction of this learned fora within the meaning of section 4 of Khyber Pakhtunkhwa Service Tribunal Act, 1975 inter alia on the following grounds;

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GROUNDS:

- A. That the impugned order of Reverted into Lower Rank passed by both the respondents No.1 & 2 respectively is not in accordance with law, rules and the principles of natural justice, hence it is liable to be set aside.
- B. That both the impugned orders of respondent No.1 & 2 are unspeaking, therefore unwarranted, unsustainable in the eye of the law, due to the reasons that the specification of the period of Revert to the Lower Rank of the appellant, is not unveiled, hence on this score alone the impugned orders has no foundation, as per dictum set by superior courts of Pakistan inn such like cases.
- C. No doubt, appellant remained PTC instructor from 2007 to 2009 and law instructor from 2015 to 2017 by extending his extra ordinary services to the department in the special circumstances, asked to advance by the department, which comprehensively been advanced and even thereafter too, by retaining the IHC rank, appellant never go against the procedural superiority of any nature in any mean whatsoever, therefore, the allegations leveled against the appellant are nothings but categorical discrimination.
- D. It is a simple case of discriminatively treatment to the appellant by respondent No.1 & 2, whereby no personal hearing or proper course of investigation ^{inquiry} through appointed officer concern or committee

(10)

whatsoever, is conducted, therefore, in this special case all of the basic ingredients of inquiry is not complied with by the respondent and with the stroke of pronouncement, the above impugned order has been passed in coercive manner.

- E. That due process of law has not been followed which is mandatory in the eyes of law.
- F. That the order is also in violation of Article 10-A of the constitution, the said provision has envisaged. Hence the fundamental right of the appellant was violated which alone has made the enquiry and the impugned order legally questionable and of no legal consequences upon the rights of the appellant.
- G. That the appellant has completely innocent and he didn't commit any excessive, beyond his mandate act to hand on glove to any other of such rank, and it even cannot be, so required to be treated accordingly.
- H. That total liability as well as responsibility was the incharge of the police station and not of the appellant, so in this respect it is unfortunate to say that no departmental proceedings in any means is taken against incharge police station, but against the appellant solely, so this act of the respondent department is sheer violation of equal treatment.
- I. That any other ground with the permission of this Hon'ble Tribunal, will be raised at the time of arguments.

(11)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2023

Niaz Ali Khan APPELLANT

VERSUS

Additional IGP & others. RESPONDENTS

AFFIDAVIT

I, Niaz Ali Khan S/o Khan Wali Khan LHC/2013 Police Station Dadl Wala Unit Investigation District Lakki Marwat, R/o Mohalla Sari Khel, Sarai Naurang, District Lakki Marwat, do hereby solemnly affirm and declare on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Handwritten signature and date: 10-8-23

Handwritten signature: Niaz

DEPONENT

CNIC # 11201-0374004-9

Cell # 0331-9194176

Handwritten signature and circular stamp

(12)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2023

Niaz Ali Khan APPELLANT

VERSUS

Additional IGP & others. RESPONDENTS

ADDRESSES OF THE PARTIES

APPELLANT:


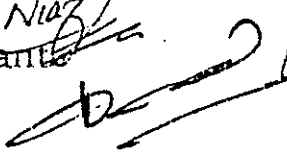
Niaz Ali Khan S/o Khan Wali Khan
LHC/2013 Police Station Dadi Wala Unit Investigation
District Lakki Marwat.
R/o Mohalla Sari Khel, Sarai Naurang,
District Lakki Marwat.

RESPONDENTS:


1. Additional Inspector General of Police,
Headquarters, Khyber Pakhtunkhwa, Peshawar.
2. Regional Police Officer, Bannu Region, Bannu.

Through

Appellant's



Arshad Ali Nowsherwi
Advocate Supreme Court
of Pakistan

&


Amjad Nawaz
Advocate, Peshawar.

(13)

Amra - A (9)

SHOW CAUSE NOTICE

You, IIC Niaz Ali No.213/905 while posted as MIIC PS Kaki, District Bannu have rendered yourself liable to be proceeded under rule 5(3) of the Khyber Pakhtunkhwa, Police Rules, 1975 (amended in 2014) for committing the following misconduct:-

- That as per reliable source you while posted as MIIC PS Kaki were hand and glove with Cook Constable Ihsanullah No.53 who had hired a private person for performing his duties in his place while he himself was running a private business.
- That you did not bring the matter in the notice of your seniors and reportedly might have referred the same to your successor for extending undue favour to the said cook constable.

That by taking cognizance of the matter, the undersigned as competent authority under the said rules, propose stern action against you by awarding one of the major punishments as provided in the rules.

You are, therefore called upon to show cause as to why you should not be imposed upon one of the major punishments for the said deviant misconduct under Khyber Pakhtunkhwa, Police Rules 1975 (amended in 2014).

You should submit reply to this show cause notice within seven (07) days of the receipt of this notice, failing which an ex parte action shall be taken against you.

You are further directed to inform the undersigned that as to whether you wish to be heard in person or not.

IIC-Niaz Ali No.213/905
The then MIIC PS Kaki, Bannu
Now at PS Lakki.
No. 05/PA, Dated: 12/01/2023.
CC:

DPO Lakki for information, please.

Regional Police Officer,
Bannu Region
Bannu

Regional Police Officer,
Bannu Region
Bannu

Amra - A
[Signature]

1/3

19/1/23

(10) - 8 Aug

بند بالا : مشعل شوکار لوٹن نہ 18/8/23 کو مہنہ 12 جاری طلب 18/8 کے مہینے میں دین
 معروض میں کہ پیش اس کے نہ 31 جو تک نسبت ان کے دل کے تمام ان میں
 سرانجام دیتا ہے . این ڈی اے کے اہل ذمہ کے سرانجام دیتا ہے . اس کے علاوہ اسٹیل
 لوکیو ڈی اے کے باقاعدہ سرانجام دیتا ہے . بلکہ سب سے پہلے ان کے لئے ان کے لئے
 مہینہ کے لئے . جو کہ تمام میں مذکورہ نسبت کے مکان دوسرے تک نسبت نہیں
 ضرورہ نسبت کے لئے ضروری ہوگا کہ یہ اور رشتہ داروں کے غم خوئی میں متکریں
 کہلئے ہوں مذکورہ نسبت کے لئے 31 کو طلب 18/8 کے مہینے کے اجازت سے
 یہ آ رہا ہے جو دن چھوڑنا تھا . جس کے بدلے میں ضابطہ 18/8 کے خود
 اتانہ لئے کہ میں انتظام لکھیے دوسرے کے ساتھ ساتھ ان کے لئے کو آ رہا ہے
 دن کے لئے طلب کرتے . تاکہ لوگ نہیں کر کھانا باہر نہ جانا پڑے . کہ جو کہ موجود
 حالات میں لوگ نہیں نکال سکتے ہیں جبکہ اور جمع ہونا کسی بن فطرت کے حال
 نہیں ہے . میں نے ضابطہ 18/8 کے ساتھ ساتھ دن کے لئے دوسرے کے لئے
 کرتا . اس میں MHE کوئی غلطی نہیں ہے . کہ جو کہ میں نے MHE کا سٹیٹ
 لوکٹ ایئر فورڈ تمام فیو لوڈ تھا . شوکار لوٹن میں میں MHE مہینہ کے لئے
 گیا ہے . وہ سرانجام غلط اور میں گھڑے اور سمجھنے میں ہے . جس کا
 قصے کوئی لینا دینا نہیں ہے .

اپنے رشتہ داروں کے لئے ان کے لئے ضروری اور درج ذیل دفتر خواہی جاوے

MHE P.S. Lalhal Mandwa
19-01-23

Aurha

15

Amr C 11 ~~11~~ 7-15/02

ORDER:

This order will dispose of Show Cause Notice served upon IHC Niaz Ali No.213, while posted as MHC PS Kaki, District Bannu has rendered himself liable to be proceeded under rule 5(3) of the Khyber Pakhtunkhwa, Police Rules, 1975 (amended in 2014) for committing the following misconduct conveyed to him vide this office No.05/PA dated 12.01.2023:-

- That as per credible information, he was hand in glove with Cook constable Ihsanullah No.53 as the said cook constable had hired a private person for performing his duties in his place while he himself was running private business.
- That IHC Niaz Ali (then MHC Kaki) did not bring the matter in the notice of his seniors and extended undue favour to the said cook constable.

Reply to the Show Cause Notice was received and he was heard in person during orderly room held in RPO Office Bannu on 16.02.2023. His plea was not found convincing, as he, above named cook constable and other colleagues categorically admitted that one "Tabidar Uncle" had been performing as Cook in P.S Kaki. The said cook constable further added that he was suffering from allergy; therefore he had hired the above mentioned person. IHC Niaz Ali (then MHC Kaki) and the above named cook constable cheated their superior officers. The cook constable was taking full pay from the government and hiring a private person for performing duties in his place @ of Rs:8000/- per month while the cook constable himself was running a private business. It is not only against discipline but also ignoble.

Therefore, I, Syed Ashfaq Anwar, PSP, Regional Police Officer, Bannu Region Bannu, in exercise of the powers vested in me under Khyber Pakhtunkhwa Police Rules, 1975 (amended in 2014) am constrained to disagree with his plea. He is hereby reverted to a lower rank with immediate effect.

ORDER ANNOUNCED

OB No. 50
Dated: 27.03.2023

Regional Police Officer,
Bannu Region,
Bannu

No. 907 /EC, dated Bannu the 27/03/2023
Cc:

- > DPO-Bannu for information and necessary.
- > DAO Bannu for information and necessary.
- > OS/EC RPO Office Bannu.

Handwritten signature

Regional Police Officer,
Bannu Region,
Bannu

ORDER:

This order will dispose of Show Cause Notice served upon IHC Niaz Ali No.213, while posted as MHC PS Kaki, District Bannu has rendered himself liable to be proceeded under rule 5(3) of the Khyber Pakhtunkhwa, Police Rules, 1975 (amended in 2014) for coming the following misconduct conveyed to him vide his office No.05/PA dated 12.01.2023:

- That as per credible information, he was hand in glove with Cook constable Ihsanullah No.53 as the said cook constable had hired a private person for performing his duties in his place while he himself was running private business.
- That IHC Niaz Ali (then MHC Kaki) did not bring the matter in the notice of his seniors and extended undue favors to the said cook constable.

Reply in Show Cause Notice was received and he was heard in person during orderly room held in RPO Office Bannu on 16.02.2023. His plea was not found convincing, as he, above named cook constable and other colleagues categorically admitted that one "Tabidar Uncle" had been performing as Cook in P.S Kaki. The said cook constable further added that he was suffering from allergy; therefore he had hired the above mentioned person. IHC Niaz Ali (then MHC Kaki) and the above named cook constable cheated their superior officers. The cook constable was taking full pay from the government and hiring a private person for performing duties in his place @ of Rs.8000/- per month while the cook constable himself was running a private business. It is not only against discipline but also ~~is~~ ignorable.

Therefore, I, Syed Ashfaq Anwar, PSP Regional Police Officer, Bannu Region Bannu, in exercise of the powers vested in me under Khyber Pakhtunkhwa Police Rules, 1975 (amended in 2014) am constrained to disagree with his plea. He is hereby reverted to a lower rank with immediate effect.

Order announced
Ob No.58
Dated:27.03.2023

Sd/-
Regional Police Officer
Bannu region,
Bannu

No.907/EC, dated Bannu the 27.03.2023

Cc:

- DPO-Bannu for information and necessary.
- DAO Bannu for information and necessary.
- OS/EC RPO Office Bannu.

(17)

(1)

(18)

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بخدمت جناب پرو فیشل پولیس آفیسر صاحب خیر پختونخوا پشاور

مزید اپیل، عدالت آراء نمبر 08-58 مورخہ 27-03-2023 / EC-907 مورخہ 27-03-2023، جب تک پولیس آفیسر صاحب خیر

جناب عالی

معروضہ شدت میں کہ من ماسک مورخہ 10/07/2002 کو بلور کا لٹیل ملکہ پولیس میں آفسران بالا صاحبان نے بھرتی فرمایا۔ من ماسک کا نقلی معیار ایف اے ہے۔ پولیس ٹرینگ کالج، بنگو سے پاس کیا ہے۔ دو کالو کالنگف کورسز ATSS ملی اسلام آباد سے کیس کورس، سیکشن کورس، انور کورس، انٹر میڈیٹ کورسز PTC، بنگو سے کیے ہیں۔ سال 2007-2009 انٹر کٹر PTC، بنگو میں رد چکا ہے۔ 2015-2017 RTW کورس میں لا، انٹر کٹر 2020-2022 تک پولیس ٹرینگ سکول کورس میں لا، انٹر کٹر کے خدمات سر انجام دے چکا ہوں۔ ضلع خوں کے مختلف قعاتوں میں بلور MHC، مختلف چوکات میں بلور انچارج کی ذیوبی سر انجام دے چکا ہوں۔ سال 2008 میں PTC، بنگو سے ضلع بوٹیر کے اپریشن میں حصہ لیا تھا۔ سال 2006 اور 2007 میں ضلع کی مرمت سے سوات اپریشن میں شامل تھا۔ حال ہی میں ضلع کی مرمت میں جاری شدہ اپریشن میں بھی ماسک آری کے ساتھ فرنٹ لائن پر شامل مال رہا۔

ماسک کے والد صاحب خان ولی خان ملکہ پولیس ٹرینگ کالج، بنگو میں بلور اول انٹر کٹر اور چیف اول انٹر کٹر کے عہدے پر کافی عرصہ رہ کر پولیس آفسران جین کر چکے ہیں۔ جس کی قابلیت ملکہ پولیس کے سینئر اور کالیہ سنسٹریاب بھی قدر کی نگاہ سے دیکھتے ہیں۔

جناب والا من ماسک آفسران بالا صاحبان کے حکم پر بلور مورخہ 15 اکتوبر 2022 کو تعینات فرمایا۔ جو کہ صرف 1/2 بلور مورخہ 2 اکتوبر مورخہ 2 اکتوبر کی رو چکا ہوں۔ مجھ سے قبل احسان اللہ 53/FC ہوں جو کہ جناب ای بی او صاحب خوں نے قاعدہ کی میں بلور لگ کا لٹیل تعینات کیا تھا۔ موما قاعدہ میں SHO صاحب اپنے ماتحت ملکہ کو نمبر پر شاہاشی دیا ہے۔ جو کہ 2/ارات کے لئے گھر چھوڑتے ہیں۔ اسی طرح جب کا لٹیل احسان اللہ 53 کو SHO صاحب شاہاشی دیا تھا وہ اپنے قاعدہ نقری روئی کے لئے ایک پرائیویٹ شخص نامی تابعدار کو بھلا کر احسان اللہ 53/FC کی جگہ میں کام کروا تھا۔ اس میں من ماسک کی کوئی کوئی یا قصور نہیں ہے۔

APR 18

جناب P221 صاحب غوں نے مجھے اس پر رولڈ نظر لایا ہے۔ جس کا نوٹز کاپی آرڈر ہوا ہے۔ ایک ہیڈ کانسٹیبل کا اس میں کیا تصور ہے۔ جناب SHO صاحب نے خود قیٹی پر جناب DIG صاحب کو بتایا کہ کانسٹیبل احسان اللہ 53 کو من SHO صاحب نے شاباشی پر چھوڑا ہے۔ اور دوسرا شخص تالعدار سے میں کا کام لیتا ہوں۔ جناب DIG صاحب کو کسی نے گناہ اتاری کر کے مجھے مزادی ہے۔ حالانکہ گناہ شکایات پر کسی کے خلاف کارروائی کرنا بحوالہ سول سروس PLC 1043 سال 2012 فیروز آبادی ہے۔ اس کے 11 سال 2008 میں بابت گناہ اتاری پر کارروائی کرنے لیا۔ انگریزی فیروز آبادی 25/04/2008 OCY Dated 251-58 جاری ہے جناب انسپیکٹر جنرل آف پولیس ملک فیروز صاحب دیر سال 2011 میں لیا۔ انگریزی فیروز آبادی 951-90 E&I / Dated 11/06/2011 جاری ہے جناب انگریزی ایڈنا انسپیکشن آفیسر جناب سلطان عقیف صاحب اور کرنل جاری کیا ہے۔ ہوا ہے۔ اور میں سلسلہ بابت گناہ اور درخواست اتاری پر کسی قسم کی کارروائی نہ کرنے کے بارے ہائی کورٹ اسلام آباد سے (C.S) PLC Note 4 سال 2023 میں جاری کیا ہے اس طرح ہریم کورٹ الٹ پاکستان نے بھی بابت گناہ اتاری پر کسی قسم کی کارروائی نہ کرنے پر SCMR 181 سال 2012 میں جاری کیا ہے۔ گناہ کاپیاں ہر طرف اٹیل ہڈا کی ہے۔ پولیس آفیسر کو معمولی خلاف ورسیوں پر بڑی سزا دینے سے پولیس آفیسر کی دل اتاری ہوتی ہے۔ جس پر بھی PLD جاری ہو چکا ہے۔

لہذا اسے مانے کہ میرے چھوٹے بچوں پر دم لیا جائے جملہ حالات و واقعات ہا کورڈ نظر رکھا کر مجھے اپنے قہدے پر راجا ارشن سے بہال فرمادے۔ کیونکہ سائل کا اس میں کوئی تصور نہیں ہے۔ سائل دعا گو ہے۔ گ۔
نوٹ: اشرفیوں کی پٹریاں شے بلا پتہ لفظ ہے۔

موری: 04/2023

العارض

32.41
11/4

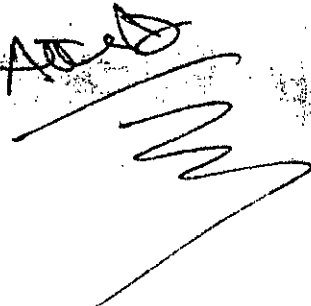
سری
for a further
process:

یار علی خان LHC/213 حقیقہ قمانہ جانی خیل ضلع بنوں

Niaz
0331-9194176
NIC: 11201-0374834-9

DEPARTMENT OF
BANKING

ATC





INSPEC
KH

GENERAL OF POLICE
KHYBERPAKHTUNKHWA
PESHAWAR.

2/8/23
(19)

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 No/ All No. 213. The petitioner was awarded punishment of reversion from the rank of IIC to LHC by RPO Bannu vide OI No. 58, dated 27.03.2023 on the allegations that he was found in glove with cook constable Ihsan Ullah No.53 as the said cook constable had hired a private person for performing his duties in his place while he himself was running private business. He did not bring this matter into the notice of his seniors and extended undue favor to the said cook constable. The cook constable was getting full salary from the Govt. while the private person was paid 8000/- to perform duties at his place.

Meeting of Appellate Board was held on 02.06.2023 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. SI 1916-21 Dated Peshawar, the 21-07-2023.

Copy of the above is forwarded to the:

1. Regional Police Officer, Bannu. One Service Roll alongwith Enquiry Missal (Containing Enquiry File), of the above named LHC received vide your office Memo No. 16224-C dated 26.05.2023 is returned herewith for your office record.
2. District Police Officer, Bannu.
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 (PC) Peshawar.
7. Office Supdt: I-IV (PC) Peshawar.

No. 2491-156
dt 01/8/23 DPO/Bannu
FK

Attd

DR. ZAHID ULLAH PSP
AIG/L-Subjunctment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

22

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

ORDER

This order is hereby passed in dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted LHC Niaz Ali No.213. The petitioner was awarded punishment of reversion from the rank of LHC to LHC by RPO Bannu vide OB No.58, dated: 07.03.2023 on the allegations that he was hand in glove with cook constable Ihsan Ullah No:53 as the said cook constable had hired as private person for performing his duties in his place while he himself was running private business. He did not bring this matter into the notice of his seniors and extended undue favor to the said cook constable. The cook constable was guiding full salary from the (sic) while the private person was paid 8000/- to perform duties at his place.

Meeting of Appellate Board was held on 02.06.2023 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 granted 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/1916-21/23, dated Peshawar the 21.07.2023

Copy of the above is forwarded to the:

1. Regional Police Officer, Bannu. One Service Roll alongwith Fuj Missal (Containing Enquiry File), of the above named LHC received vide your office Memo: No.1622/FC dated 26.05.2023 is returned herewith for your office record.
2. District Police Officer, Bannu.
3. AIH/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Adl: LIP/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.

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