

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

**Service Appeal No. 1453/2023**

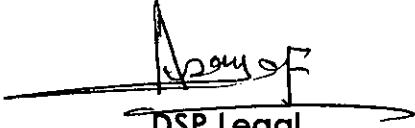
Atta Muhammad, IHC No.43, Traffic Police Peshawar..... (Appellant)

VERSUS

Government of KP through chief secretary and others ..... (Respondents)

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DSP Legal,  
City Traffic Police,  
Peshawar  
Deputy Superintendent of Police Legal  
City Traffic Police,  
Peshawar.

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

**Service Appeal No. 1453/2023**

Atta Muhammad, IHC No.43, Traffic Police Peshawar..... (Appellant)

VERSUS

Government of KP through chief secretary and others ..... (Respondents)

**COMMENTS BY RESPONDENTS NO. 2,3,4 & 5**

**RESPECTFULLY SHEWETH:**

**Khyber Pakhtunkhwa  
Service Tribunal**

Diary No. 10524

Dated 12-1-2024

**PRELIMINARY OBJECTIONS.**

1. That the appeal is badly barred by law & limitation.
2. That the appeal is bad for miss-joinder and non-joinder of necessary and proper parties.
3. That the appellant has not come to this Hon'able Tribunal with clean hands.
4. That the appellant has no cause of action and locus standi to file the instant appeal.
5. That the appellant is estopped by his own conduct to file the instant appeal.
6. That the appellant has concealed the material facts from this Honorable Tribunal.
7. That this tribunal lacks jurisdiction to adjudicate upon the matter.

**FACTS:**

1. Pertains to record.
2. Incorrect, appellant has shown misconduct on various occasions while performing official duty thus punished on several occasions. ( Punishments orders are annexed as A).
3. Incorrect, appellant was awarded minor punishment of stoppage of increment for the period of 2-years with cumulative effect after fulfillment of all codal formalities of proper departmental proceedings.(Complete enquiry file is annexed as B ).
4. Incorrect, departmental appeal of the appellant was rejected after giving him proper opportunity of personal hearing to prove his innocence in which the appellant failed to provide any cogent evidence/reason to prove his innocence in the incident.
5. Incorrect, appellant was provided all the relevant information and record on-time without any un-necessary delay.
6. Incorrect.

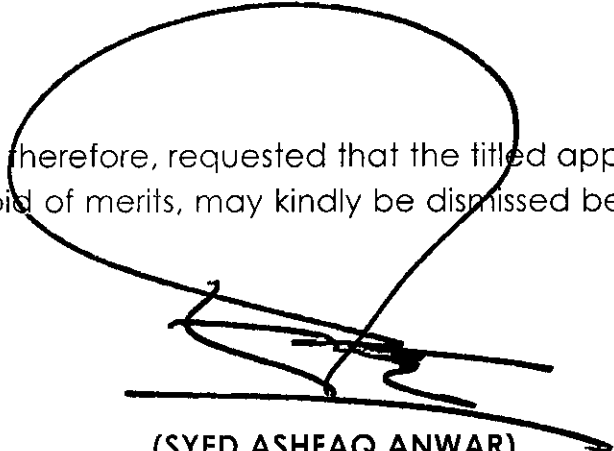
**GROUND:**

- A. Incorrect, the order dated 22-12-2021 is based on proper departmental enquiry and fulfilling all legal codal formalities. While departmental appeal order dated 10-02-2022 was rejected after giving the appellant proper opportunity for personal hearing, upon which the petitioner failed to provide any cogent reason and evidence to prove his innocence.
- B. Incorrect, the order dated 22-12-2021 of respondent no.2 is based upon proper departmental enquiry and after fulfilling all legal/codal formalities. Thus upon the completion of departmental enquiry, the punishment order was issued based upon the recommendation of enquiry officer.

- C. Incorrect, the order dated 22-12-2021 of respondent no.2 is based upon proper departmental enquiry and after fulfilling all legal/codal formalities. Thus upon the completion of departmental enquiry, the punishment order was issued based upon the recommendation of enquiry officer. Statements of all the relevant individuals related to the issue were recorded and the petitioner was given due opportunity throughout enquiry by means of personal hearing etc to prove his innocence but he failed.
- D. Incorrect, as explained in Para-C of grounds.
- E. Incorrect, as explained in Para-B of grounds.
- F. Incorrect, as explained in Para-B of grounds.
- G. Incorrect, the appellant has been treated in accordance with law and rules.
- H. Incorrect, all the fundamental rights enshrined in the constitution of Pakistan 1973 has been duly ensured by the respondents.
- I. That respondents may kindly be allowed to raise additional grounds at the time of hearing/arguments.

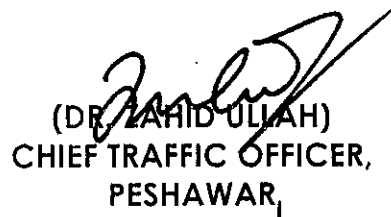
**PRAYER:**

In view of the above, it is therefore, requested that the titled appeal being barred by law and devoid of merits, may kindly be dismissed being meritless.



(SYED ASHFAQ ANWAR)  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

- 3



(DR. ZAHID ULLAH)  
CHIEF TRAFFIC OFFICER,  
PESHAWAR

*Respondent No- 234*



(MUHAMMAD SAEED)  
SUPERINTENDENT OF POLICE CITY,  
CITY TRAFFIC POLICE, PESHAWAR

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

**Service Appeal No. 1453/2023**

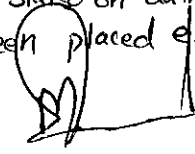
Atta Muhammad, IHC No.43, Traffic Police Peshawar.....(Appellant)

VERSUS

Government of KP through chief secretary and others ..... (Respondents)

**AFFIDAVIT**

I Respondent No. 05 do hereby solemnly affirm on Oath that the contents of written comments are true and correct to the best of my knowledge and belief. Nothing has been concealed from this Honorable Tribunal. It is further stated on oath that in this appeal, this answering respondents have neither been placed ex-parte nor their defense struck off/cost.



(MUHAMMAD SAEED)  
SUPERINTENDENT OF POLICE CITY,  
CITY TRAFFIC POLICE, PESHAWAR

Handwritten notes: 7/10, 12/1, 24





OFFICE OF THE  
CHIEF TRAFFIC OFFICER,  
PESHAWAR  
☎ 091-9225361

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**AUTHORITY LETTER**


I, Dr. Zahid Ullah (PSP), Chief Traffic Officer (CTO), Peshawar hereby Authorize Mr. Amir Sayaf, DSP Legal City Traffic Police, Peshawar to attend Service Appeal No. 1153/2023 titled Atta Muhammad VS Govt: of KPK & others pertaining to this office in Khyber Pakhtunkhwa Service Tribunal on behalf of the undersigned.

  
CHIEF TRAFFIC OFFICER,  
PESHAWAR.



**EMPLOYEE BIO-DATA**  
**Human Resource Management System**  
**City Traffic Police, Peshawar**

**PERSONAL INFORMATION**

|                                     |                           |                     |   |
|-------------------------------------|---------------------------|---------------------|---|
| Status (Regular/On Loan/Pay Attach) | Regular                   |                     |   |
| Category                            | Executive                 |                     |   |
| DDO                                 | SSP Traffic               |                     |   |
| Belt No                             | 43                        |                     |   |
| Name                                | Atta Mohammad Khan ✓      |                     |  |
| Father Name                         | Haji Taj Mohammad Khan    |                     |   |
| Gender                              | Male                      | CNIC                | 1730113517955   |
| Mobile No                           | 03339121895               | Personal No         | 1093114   |
| Passport No                         | Nil                       | Blood Group         |   |
| Date of Birth                       | 01-01-1979                | Religion            | Islam   |
| Maslak                              | Sunni ✓                   | Caste               | Afghan  |
| Present Address                     | landi dauod Zaj Charsadda |                     |   |
| Permanent Address                   | landi dauod Zaj Charsadda |                     |   |
| Police Station                      | Daudzai                   | District (Domicile) | Peshawar ✓  |
| Appointment District                | Peshawar                  | Appointment Date    | 01-01-2001 ✓  |

**QUALIFICATION**

|               |                        |      |         |
|---------------|------------------------|------|---------|
| Qualification | Institute              | Year | Remarks |
| Matric        | Govt: High School NO 2 | 1996 |         |

**POSTING**

|                |                    |                   |                |            |            |         |
|----------------|--------------------|-------------------|----------------|------------|------------|---------|
| Circle/Section | Sector/Sub Section | Place of Posting  | Order Number   | From Date  | To Date    | Remarks |
| HQs            | G T Road 1         | Chips G.T Road-1  | 2396/2405-Oasi | 11-11-2021 | 30-12-2021 |         |
| Cantt          | Khyber Road        | chips khyber road | 989-1011/OSI   | 02-09-2020 |            |         |
| HQs            | GT Road 2          | CHIPS GT ROAD 2   | 623-36 OSI     | 18-06-2020 |            |         |

**PROMOTION**

|                |          |         |        |              |            |                |
|----------------|----------|---------|--------|--------------|------------|----------------|
| From Rank      | From BPS | To Rank | To BPS | Order Number | Order Date | Promotion Type |
| Head Constable | 9        | ASI     | 11     | 272          | 10-09-2015 | Shoulder       |

**TRAINING**

|               |           |            |            |        |         |
|---------------|-----------|------------|------------|--------|---------|
| Training Name | Institute | From       | To         | Result | Remarks |
| Intermediate  | PTC Hangu | 01-12-2017 | 31-03-2018 | Pass   |         |

**REWARD**

|      |         |           |      |         |
|------|---------|-----------|------|---------|
| Type | Details | OB Number | Date | Remarks |
|------|---------|-----------|------|---------|

**PUNISHMENT**

|                |  |           |      |            |
|----------------|--|-----------|------|------------|
| Type           | Details  | OB Number | Date | Remarks    |
| Punishment pay | charge from 08/04/2018 to 09/04/2018 one day absent from duty punishment absence period as two | 179       |      | 23-04-2018 |

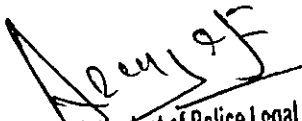
**LEAVE**

|            |            |            |           |            |
|------------|------------|------------|-----------|------------|
| Leave Type | From       | To         | OB Number | Date       |
| Casual     | 08-11-2020 | 15-11-2020 | 07        | 08-11-2020 |
| Casual     | 11-03-2021 | 12-03-2021 | 01        | 11-03-2021 |

**FAMILY**

|             |          |            |     |          |
|-------------|----------|------------|-----|----------|
| Name        | Relation | Occupation | Age | Address  |
| lawad ali   | Brother  | Student    | 06  | peshawar |
| Shehzad ali | Brother  | Student    | 04  | peshawar |
| Waqas ali   | Brother  | Child      | 02  | peshawar |
| Zai ali     | Sala     | police     | 27  | Peshawar |

Designed &amp; Developed by IT Wing, City Traffic Police, Peshawar.

Attested by  
  
Deputy Superintendent of Police Legal  
City Traffic Police,  
Peshawar.

ORDER

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Constable Atta Muhammad No.1198 was involved in a criminal case vide FIR No.1147 dated 18.12.2004 u/s 337/F(2)/147 PS; Faqir Abad and remained absent from his lawful duty w.e.f 18.12.2004 vide DD No.26 to 29.12.2004 vide DD No 25, without prior permission or leave from his Senior Officer. He is not taking interest in his legitimate duty also habitual absentee. Being a Police force his this act amounts to gross misconduct and against the discipline of the force.

In this connection proper departmental proceeding was initiated under NWFP, Removal From Service (Special Power) Ordinance 2000, against the above named defaulter official and Mr. Gul Khan DSP/Invest: was appointed as enquiry officer who submitted in his findings that the defaulter official Atta Muhammad No.1198 involved in criminal case No.1147 dated 18.12.2004 u/s 337/F(2)/147 PS; Faqir Abad and also remained for a period of 12 days he also recommended that his period may be counted as Medical Leave.

Show Cause Notice was issued to him vide this office No.04/E dated 19.01.2005 to the defaulter official Atta Muhammad No.1198 and also heard in person by the undersigned. He produced affidavit of compromise and also accepted by the Court and acquitted in the said case. Consents of DSP/Legal has already been obtained in this case.

From the perusal of the recommendation of Enquiry Officer and other material on record, it is proved beyond any doubt, that the charges leveled against the defaulter official Atta Muhammad due to involvement in criminal case vide above but later on made compromise between the parties. On the basis of compromise the accused official acquitted by the Court of law. Therefore, I award him minor Punishment "Censure" under NWFP, Removal From Service (Special Power) Ordinance 2000. His absence period is treated as Medical leave. Remaining pay released.

(GUL SAID KHAN AFRIDI)  
SP/HQrs:

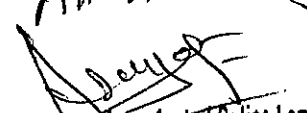
CAPITAL CITY POLICE PESHAWAR

OB No. 959 Dated 21/3/2005

No. 431-38 /PA dated Peshawar the 21/3/2005

Copy of above is forwarded to:-

- The Capital City Police Officer, Peshawar for kind information
- The Sr. Superintendent of Police, Operation Peshawar.
- The Budget Officer.
- RI/LO, Police Lines Peshawar
- CRC, OASI, FMC alongwith complete departmental enquiry file.
- Official concerned.

Attested by  
  
Deputy Superintendent of Police Legal  
City Traffic Police,  
Peshawar.

CHARGE SHEET

1. WHEREAS I am satisfied that a formal enquiry as contemplated by Police Rules 1975 'is necessary and expedient.
2. AND whereas, I am of the view that the allegations if established would call for major/minor penalty, as defined in Rule-3 of the aforesaid Rules.
3. Now therefore, as required by Rule 6 (1) (a) & (b) of the said Rules, I, **ABBAS MAJEED KHAN MARWAT**, PSP, Chief Traffic Officer, Peshawar hereby charge you **IHC Atta Mohammad Khan No.43** (ASI on acting charge basis) under Rules 5 (4) of the Police Rules 1975 on the basis of following allegations:-
  - i. A video has been viraled on social media wherein it has been seen that you are taking a shoe polish "Daba" from a poor child free of cost who was selling shoes polish on the road side.
  - ii. Your this act has badly tarnished the image of police department in the eyes of general public.
  - iii. All this amounts to gross misconduct on your part.
4. AND I hereby direct you further under Rule 6 (I) (b) of the said Rules to put-in written defence within 07-days of the receipt of this Charge Sheet as to why the proposed action should not taken against you and also state whether you desire to be heard in person.
5. AND in case your reply is not received within the stipulated period to the enquiry officer, it shall be presumed that you have no defence to offer and in that case, ex-parte action will be taken against you.

*Abb*  
 (ABBAS MAJEED KHAN MARWAT) PSP  
 CHIEF TRAFFIC OFFICER,  
 PESHAWAR.

(Competent Authority)

No. 1662 /PA,

Dated: 01/12 /2021.

*Received from*  
 1/12/21 *[Signature]*

*Attested by*  
*[Signature]*  
 Deputy Superintendent of Police Legal  
 City Traffic Police,  
 Peshawar.



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**DISCIPLINARY ACTION**

1. I, **ABBAS MAJEED KHAN MARWAT**, Chief Traffic Officer, Peshawar as competent authority, am of the opinion that you **IHC Atta Mohammad Khan No.43** (ASI on acting charge basis) has rendered himself liable to be proceeded against, as he committed the following acts/omission within the meaning of section 03 of Police Rules 1975.

**SUMMARY OF ALLEGATIONS**


- i. A video has been viraled on social media wherein it has been seen that he is taking a shoe polish "Daba" from a poor child free of cost who was selling shoes polish on the road side.
- ii. His this act has badly tarnished the image of police department in the eyes of general public.
- iii. All this amounts to gross misconduct on his part.

2. For the purpose of scrutinizing the conduct of the said accused official with reference to the above allegations, an Enquiry Committee comprising of the following officer(s) is constituted:-

a. Mr. Mohamamd Saeed SP/City, Traffic, Peshawar.

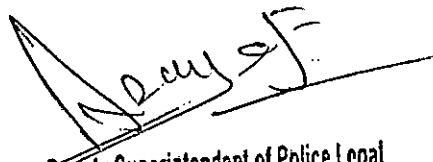
b. \_\_\_\_\_

3. The enquiry committee/officer shall in accordance with the provision of the Police Rules 1975 provide reasonable opportunity of hearing to the accused officer/official and make recommendations as to punishment or any other appropriate action against the accused.

  
**(ABBAS MAJEED KHAN MARWAT) PSP**  
CHIEF TRAFFIC OFFICER,  
PESHAWAR.

(Competent Authority)

Attested by

  
Deputy Superintendent of Police Legal  
City Traffic Police,  
Peshawar.

6



OFFICE OF THE  
CHIEF TRAFFIC OFFICER,  
PESHAWAR

Phone 091-922 5361/Fax 091-9225368  
e.mail: ctopeshawar@ptpkp.gov.pk

(9)



**ORDER**

Due to his misconduct IHC Atta Mohammad Khan No.43 (ASI on acting charge basis) is hereby placed under suspension and closed to Traffic Lines Peshawar with immediate effect.

2. Charge Sheet and summary of allegations are being issued to him for departmental action.

3. Mr. Muhammad Saeed, SP/City Traffic Peshawar is directed to conduct formal departmental enquiry against him under the Khyber Pakhtunkhwa Police Rules 1975.

*Abbas Majeed Khan Marwat*  
( ~~ABBAS MAJEED KHAN MARWAT~~ ) PSP  
CHIEF TRAFFIC OFFICER,  
PESHAWAR.

No.1656-61/PA, Dated Peshawar the 01/12/2021.

Copies to the:-

1. SP/HQrs: Traffic, Peshawar.
2. SP/Cantt: Traffic, Peshawar.
- ✓ 3. SP/City, Traffic, Peshawar.
4. D.D.I.T, Traffic, Peshawar.
5. EC, SRC-I & SRC-II
6. OASI/Reader CTO

*Attested by*

*Deputy*  
~~Deputy Superintendent of Police Legal  
City Traffic Police,  
Peshawar.~~



(10)

**OFFICE OF THE  
SUPERINTENDENT OF POLICE TRAFFIC (CITY),  
CITY TRAFFIC POLICE PESHAWAR  
PH # (091-9225370)**



To: The Chief Traffic Officer,  
City Traffic Police, Peshawar.

No. 105 /R, dated Peshawar the 11/7/12/2021

Subject: - **ENQUIRY AGAINST CHIPS G.T ROAD IHC/TO ATTA  
MUHAMMAD NO.43.**

Memo:

Kindly refer to your office Memo: No.1662/PA, dated 01.12.2021,  
on the subject noted above.

**ALLEGATIONS.**

This is a departmental enquiry against the above cited police official that he while posted as Chips G.T Road, Peshawar where as a video has been viral on social media wherein it has been seen that he is taking a shoes polish Dabba from a poor child free of cost who was selling shoe polish on the road side. His act has badly tarnished the image of police department in the eyes of general public. All this amounts to gross misconduct on his part.

For the purpose of scrutinizing the conduct of said alleged official with reference to the above allegation the undersigned was appointed as Enquiry officer.

**PROCEEDINGS.**

The above named TO was called to the office of the undersigned, Charge Sheet along with Disciplinary Action was served upon him the accused TO was directed to appear before the undersigned within stipulated period of time i.e 07-days. The alleged TO appeared before the undersigned he was heard/examined, his statement was recorded.

**STATEMENT OF IHC/TO ATTA MUHAMMAD NO.43.**

The alleged TO in his written statement stated that he been deputed as chips G.T Road-1. On 30.11.2021, while he was on duty, purchased a shoe polish from a street vendor but due to call of high-ups for some emergency duty he leave the spot immediately without paying the amount of the shoe polish unintentionally and later on after an hour paid the said amount to him. He was not aware about the subject viral video. All this was happened due to misunderstanding and he is innocent.

*Attested by*  
*Asayajf*  
Deputy Superintendent of Police Legal  
City Traffic Police,  
Peshawar.

**STATEMENT OF VENDOR LIAQAT ALI.**

The vendor Liaqat Ali in his written statement stated that at the time of incident he went to his home for his needful, leave the shop to a boy. He did not aware of the incident, however after his return to his selling point a vendor namely Ihsanullah in his neighbor gave him Rs.100/- stated that he had taken it from a traffic personnel for selling shoe polish to him. The remaining amount of the traffic personnel is still pending with him. No personnel of traffic police buy anything without payment from him.

**STATEMENT OF VENDOR IHSAN ULLAH.**

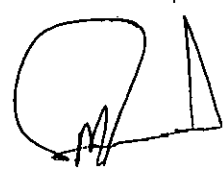
The vendor Ihsanullah in his written statement stated that at the time of incident vendor Liaqat Ali was not present and leave the shop to a boy. In the meanwhile, the mentioned traffic official came there and took away shoe polish from the boy and said that he will come back soon for the payment. After an hour the traffic official paid Rs.100/- to him (Ihsanullah) which he handed over to the vendor Liaqat Ali.

**FINDINGS.**

After going through the enquiry, statements of the alleged official and other relevant persons, the undersigned came to the conclusion that the alleged official had failed to pay the payment on time which shows his laxity resultantly spoils not only the good image of City Traffic Police, Peshawar but also the entire Khyber Pakhtunkhwa Police.

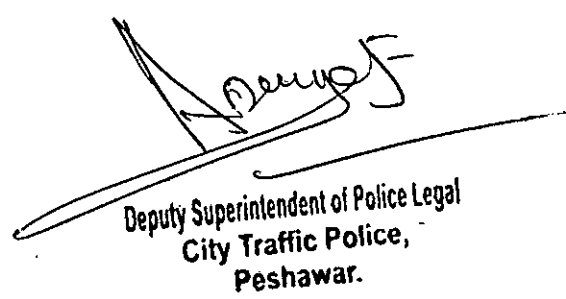
**RECOMMENDATIONS:**

Keeping in view of the above mentioned facts, the undersigned recommended that the alleged IHC/TO Atta Muhammad No.43 may please be awarded with the minor punishment of stoppage of increment for the period of Two years with cumulative effect.



**(MUHAMMAD SAEED KHAN)**  
SUPERINTENDENT OF POLICE (CITY),  
CITY TRAFFIC POLICE, PESHAWAR.

*Attested by*



Deputy Superintendent of Police Legal  
City Traffic Police,  
Peshawar.

بیان آسان زعمہ عطائی و محلہ سداہ ٹریفک لائسنس لاء

ضمانت

جوالم سٹول چارج اسٹیٹ نمبر PA 662 مورچہ 12/21 اور چارج واپس  
 کو مقرر کرنے کے لئے۔ اس کے بعد جس میں T اور دو گھنٹے تھا۔  
 اور مقرر کرنے سے پہلے فوٹو زبردستی اور جہاں لائسنس لکھا اور سہرا تھا۔  
 سائل پر پانڈا کردہ الٹا کے متعلق پتہ چھوڑ دیا اور وہ سائل روٹیشن  
 ڈیوٹی پر تھا۔ اور آج وہ پورٹریک کی روٹیشن میں مصروف تھا۔ چونکہ  
 مذکورہ لوگ سٹیل ڈیوٹی کو بھی کبھی چھوڑنے کے متعلق کوئی بات نہیں ہوئی تھی۔  
 کافی عرصے سے اس علاقہ کے ایجنٹ سے پتہ چل گیا ہے کہ وہ سائل چلا کر  
 پور بابا لیاقت علی کو سامان پر موجود نہ پایا۔ تو اس علاقہ نزدیک دو گھنٹے  
 والا احسان اللہ بٹیان کی پورٹریک سے پتہ چلا کہ وہ بابا لیاقت علی کے پاس  
 کام کے سلسلے میں نزدیک گیا تھا اور وہ اس کے پاس پورٹریک لے گیا اور اس سے  
 لیا گیا۔ جس پر احسان اللہ نے لکھتے ہائیں ڈیوٹی پر لائسنس اور وہ وہاں آ کر  
 گیا۔ آپ سے وہ بھی ڈیوٹی پر لکھتے ہائیں ڈیوٹی پر لکھتے ہائیں۔ لکھتے ہائیں اور  
 بسے وہ وہ۔ بسنے اسی ایشیا ڈسٹریکشن کے ڈائریکٹ کلک کی اور  
 حکم صادر کیا کہ چھوڑ دیا گیا۔ پورٹریک کی روٹیشن پر لکھتے ہائیں۔ لکھتے ہائیں  
 پائیں کا رقم ادا کیے بغیر صلیبی سے چھوڑ دیا گیا۔ اور پورٹریک کے پاس  
 حوت پر واپس آنا۔ اور پائیں کا رقم احسان اللہ کو جو بائیں 0322 90202066 اور  
 بابا لیاقت علی کو حوت کی حد تک کی۔ جس نے باقاعدہ اسے اس پائیں کی رقم دی جس کی  
 لکھتے ہائیں احسان اللہ نے بیان سے کی جاسکتی ہے۔ جس کی اس بابت نہ کوئی پروا ہے  
 اور نہ ہی دوران سروس اس قسم کی کوئی غیر قانونی حرکت کی ہے۔ جو کہ وہ اس علاقہ کے  
 کی غمازی کر رہا ہے۔ اس پر اس کے خلاف گھنٹے لکھتے ہائیں اور لکھتے ہائیں  
 داخل دفتر فرمایا جائے اور اس کی Suspension order کو ختم کرنے اور چھوڑ دینے کے  
 حکم صادر فرمایا گیا۔

Superintendent of Police  
 Traffic (City), Peshawar.

Attested by  
 Deputy Superintendent of Police Legal  
 City Traffic Police,  
 Peshawar.

Nov. 03. 01. 5949236

# بیان انماں لیاقت علی بوٹے پاش فروخت

ضابطہ

میں سبھی لیاقت علی بوٹے پاش فروخت والا یہ بیان کرتے ہیں کہ میں تقریباً ۱۰ سال سے پشاور سے شہر کی ٹرانسپورٹ انڈسٹری میں لگے ہوئے ہوں اور ساتھ ساتھ پاش اور ساتھ پاش والا پیدائش بھی فروخت کرتا ہوں۔ ایک طرح آیا اور مجھے کیا ہے میں نہیں جانتا ہوں۔ گاڑیوں کے شیشے صاف کرتا ہوں۔ سٹین چھڑا رہا تھا۔ میرا سہرا بانی ہے اپنے ساتھ کام پر لگادے تو میں نے اس کو کیا پاش فروخت کروں، اپنے لیے بھی کاموں اور مجھے بھی دے دو ہے اس کے لئے کوئی شہادت نہ تھی۔ سٹین کچھ عام ہنروری پڑھو یا سٹین پر صحت گویا آیا اور اس کے لئے کوئی شہادت نہیں ہے۔ اس کے واسطے آیا ہے۔ اس وقت موجود نہیں تھا۔ مجھے نہیں معلوم کہ وہاں ہے کیا نہیں تھا ہے۔ سٹین اصحان انسانی لڑکا جو میرے ساتھ فروخت ہوا ہے پاش فروخت کرنا ہے۔ مجھے تو بڑا ۱۰۰ روپے دے دیے اور کیا ہے پشاور پشاور پشاور ہے۔ اس میں سے بقایا ٹریفک واپس دینا ہے۔ ٹریفک واپس دینا ہے۔ ابھی تک میرے ساتھ موجود ہے ابھی تک اس کا بھی ٹریفک والوں نے مجھ سے کچھ پیسوں کے کوئی بھی بدلہ نہیں دیا ہے۔

گھنٹوں سے میرا بیان ہے  
 احسان اللہ  
 اصحان اللہ  
 CNIC No 17301-7659926-5  
 Mob. 0322-9020069

لیاقت علی بوٹے پاش  
 CNIC No 17301-7298442-3  
 Mob. 0318-9766880

*(Signature)*  
 Superintendent of Police  
 Traffic (City), Peshawar.

Attested by  
*(Signature)*  
 Deputy Superintendent of Police Legal  
 City Traffic Police,  
 Peshawar.

تراکی سوالات

(14)

1) اس واقعے کی کتنی سرکس ہے

ج: تقریباً ایک لاکھ سال

2) اس واقعے اینٹریڈ میں کونساں فوٹو ہے

ج: جی ہاں میں ریڈر یا کونساں فوٹو ہے

3) اس واقعے نے ٹریفک پولیس میں کتنے سال تراکی

ج: تقریباً ایک پارہ 2008 میں آنا تھا۔ اور 2011 تک رہا۔ پورنٹل ووالس کا تھا۔ اور پھر 2012 میں واپس ٹریفک پولیس کو آیا۔ تو یہاں تو 3 سال بنتے ہیں

4) اس واقعے نے ٹریفک میں کیا کیا تبدیلیاں لائی ہیں

ج: تقریباً تمام سے سب سے پہلے پورنٹل سے لے کر

5) اس واقعے کے بعد اس سے پہلے پورنٹل کا اندازہ کیا تھا

ج: جی ہاں تو پورنٹل پورنٹل کا اندازہ کیا تھا

6) اس واقعے کی رو سے پورنٹل کا اندازہ کیا تھا

ج: وقتاً فوقتاً اس پر انبالا میں کچھ تبدیلیاں لائی گئی ہیں

7) اس واقعے کے بعد اس کے بعد کیا تبدیلیاں لائی گئی ہیں

ج: ہاں ہاں اس واقعے کے بعد اس کے بعد کیا تبدیلیاں لائی گئی ہیں

8) اس واقعے کے بعد اس کے بعد کیا تبدیلیاں لائی گئی ہیں

ج: ہاں ہاں اس واقعے کے بعد اس کے بعد کیا تبدیلیاں لائی گئی ہیں

9) اس واقعے کے بعد اس کے بعد کیا تبدیلیاں لائی گئی ہیں

ج: ہاں ہاں اس واقعے کے بعد اس کے بعد کیا تبدیلیاں لائی گئی ہیں

10) اس واقعے کے بعد اس کے بعد کیا تبدیلیاں لائی گئی ہیں

ج: ہاں ہاں اس واقعے کے بعد اس کے بعد کیا تبدیلیاں لائی گئی ہیں

11) اس واقعے کے بعد اس کے بعد کیا تبدیلیاں لائی گئی ہیں

ج: ہاں ہاں اس واقعے کے بعد اس کے بعد کیا تبدیلیاں لائی گئی ہیں

12) اس واقعے کے بعد اس کے بعد کیا تبدیلیاں لائی گئی ہیں

ج: ہاں ہاں اس واقعے کے بعد اس کے بعد کیا تبدیلیاں لائی گئی ہیں

Attested

Deputy Superintendent of Police Legal  
City Traffic Police,  
Peshawar.

P.T.O

11) میں آپ سے جو ریڈیو گفتگو کی گئی تھی آپ کو اس کے متعلق یہ بتانا کہ جمعہ سے کوئی ریڈیو گفتگو نہیں ہوئی تھی۔  
جس میں مجھے منہ معلوم۔

12) میں دو ریڈیو وائٹل صحائف نے بعد ازاں اپنے نام پر ایک اور ایسے صحیفے کو منسوخ کیا۔

13) میں نے ایک صحیفے کو ریڈیو وائٹل ہونے کا یہ منہ معلوم کیا تھا۔ اگلی ہی جمعہ کو یہ صحیفہ منسوخ کر دیا گیا۔

14) میں نے ایک ریڈیو صحیفے کو ریڈیو وائٹل سے منسوخ کر دیا تھا۔ اس کے نام سے منسوخ کر دیا گیا تھا۔

15) میں نے ایک صحیفے کو ریڈیو وائٹل سے منسوخ کر دیا تھا۔ اس کے نام سے منسوخ کر دیا گیا تھا۔

16) میں نے ایک صحیفے کو ریڈیو وائٹل سے منسوخ کر دیا تھا۔ اس کے نام سے منسوخ کر دیا گیا تھا۔

17) میں نے ایک صحیفے کو ریڈیو وائٹل سے منسوخ کر دیا تھا۔ اس کے نام سے منسوخ کر دیا گیا تھا۔




**ORDER**

1. IHC/TO Atta Muhammad No.43 was issued Charge Sheet alongwith summary of allegations Vide No.1662/PA, dated 01.12.2021 on the charge that:-

A video has been viraled on social media wherein it has been seen that he is taking a shoe polish "Daba" from a poor child free of cost who was selling shoes polish on the road side.

2. Muhammad Saeed Khan SP/City, Traffic Peshawar was appointed as the Enquiry Officer. He carried out a detailed inquiry and submitted his report mentioned therein that IHC/TO Atta Muhammad No.43 failed to pay the payment on time which shows his laxity resultantly spoils not only the good image of City Traffic Police, Peshawar. The Enquiry Officer recommended him minor punishment of stoppage of increment for the period of two years with cumulative.

3. Keeping in view the recommendations of the Enquiry Officer, **he is awarded the minor punishment stoppage of increment for the period of two years with cumulative.**

  
**(ABBAS MAJEED KHAN MARWAT) PSP**  
CHIEF TRAFFIC OFFICER,  
PESHAWAR.

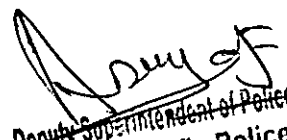
No. 1785-90 /PA, Dated Peshawar the 22/12 /2021.

Copies to the:-

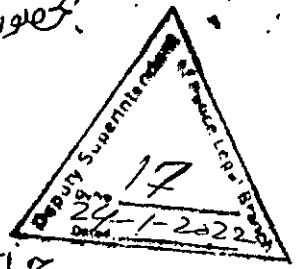
1. SSP/HQrs: Traffic, Peshawar.
2. SP/Cantt: Traffic, Peshawar.
3. SP/City, Traffic, Peshawar.
4. DDIT, Traffic, Peshawar.
5. SRC-I (along-with complete enquiry file)
6. OASI/Reader to CTO, Peshawar.

O.B No. 1339  
Date. 22-12-2021

*Attested by*

  
Deputy Superintendent of Police Legal  
City Traffic Police,  
Peshawar.

File No. 52 PA-CCPO  
18-06-2022  
22/12/2021  
178540 PA  
1339.0B



محضور جناب چیف کیسیل پولیس آفیسر صاحب لیاقت  
عنوان: فی کمانہ ایسٹ بسلسلہ انٹوائبری حکم نمبر 178540 PA  
درجہ 22/12/2021

جناب عالی

۱۔ بسلسلہ انٹوائبری حکم نمبر 178540 PA کے تحت عدالت نے فی کمانہ ایسٹ کی طرف سے ایک پانٹ کا ڈیپ لیڈ رقم اس کو ادا نہیں کیا گیا ہے اندر میں بارہ انٹوائبری آفیسر صاحب نے متعلقین کو قید علی اور احسان اللہ کے بیانات لے لیے ہیں جو انٹوائبری محکمہ کے ساتھ تصدیقی ہیں۔

۲۔ جہاں تک پانٹ ڈیپ کے بارے میں رقم نہ آئی اس کی وجہ سے اندر میں بارہ وضاحت نہیں کیا گیا ہے۔ یہ اسی وقت آفیسر بالدری جانے سے بعد رقم واپس اٹلیٹ فورم کو جمع کرنا اس جاکر ٹریڈ کھولنے کا مددگرت کرد میں فوری طور پر وہاں جا کر ٹریڈ رول دوران جاری رکھ کر فراغت پانٹ والے پاس آ کر میں نے جتنے سٹور ویڈیو کالز پانٹ والے کو دیدیا گیا با رقم اچھی اس کے پاس ہے چونکہ اسی دن پینلنگ مارٹی کا حالہ تھا۔ یہ جتنے رش اور ٹریڈوں کا مادہ تھی اس وجہ سے جگہ کے صدر کیم رش اور ٹریڈ کی بیانات کی بناء پر ٹریڈ کھول دی گئی تھی۔

۳۔ دوران انٹوائبری آفیسر صاحب نے متعلقین کے مفصل بیانات لے کر بیانات سے جہاں فور روز روشن کی وجہ سے متعلقین کو قید علی اور احسان اللہ کے متعلق کسی قسم کی لبت کستانی نہیں کی ہے۔ اور نہ ہی پانٹ ڈیپ لکھن رقم لیا گیا ہے۔

علاجہ: میں سال 2001ء کو محکمہ پولیس میں سپاہی کنسٹبل مقرر ہو کر ریٹائر ہو گیا اور انٹوائبری کو رسٹریٹ کر دیا گیا ہے۔

۲ سال اجازت کے دوران میں نے اپنی سسرکار کی ڈیوٹی نہایت ہی جالفتیاری دی پانٹاری اور خوش اسلوبی سے سسرکار آدے چکا ہوں۔ کسی بھی سسرکار کو شکایت کا دھمکا نہیں دیا ہے۔

میرے خلاف عائد کردہ التزام من گھڑت، سخر اور بے بنیاد ہے۔ بیدہ نامعلوم وجوہات کی بناء پر عائد ہونے لگی ہے۔

DSP/L  
Per comments  
PR.  
by PA  
Jesp  
18/11

اس اندر میں بارہ عاجزانہ اور موڈبانہ سسرکار نے کہ میرے دو سال اندر عدالت بجالی کا حکم صادر فرمادیں۔ تازگیت دعا گو رہو۔

Attested by  
Deputy Superintendent of Police Legal  
City Traffic Police,  
Peshawar.

HC TASI 43 عطاء محمد 0301-5949236

**BIO DATE OF ATTA MUHAMMAD FOR APPEARING IN THE ORDERLY ROOM**

| Name/No                    | Home Address | Date of Enlistment             | Charges  |  |  |  | E.O Name/Recom:                                  | Punishment   | Plea of the Applicant               | Remarks/ Opinion of DSP/Legal  | Order of the CCPO |           |       |       |      |
|----------------------------|--------------|--------------------------------|--|--|--|--|--|--|-------------------------------------|--|-------------------|-----------|-------|-------|------|
| IHC/TO Atta Muhammad No.43 |              | 31-07-2001                     | Short facts leading to the instant appeal are that the appellatant while posted at Traffic HQrs, Peshawar was proceeded against departmentally on the charges that a video went viral on social media wherein it was seen that the alleged official was taking a shoes polish Dabba from a poor child free of cost who was selling shoe polish on the road side. |  |  |  | SP/City Traffic Peshawar<br><br>Minor Punishment | Stoppage of increment for the period of 02 years with cumulative effect.<br><br>By CTO Peshawar<br><br>Vide No.1785-90/PA<br>Dt:22.12.2021<br><br>(Appeal on time) | Request to set-aside the punishment | Perusal of relevant record reveals that punishment awarded by the competent authority is in accordance with law. |                   |           |       |       |      |
|                            |              | Total Qlfy: Service            |  |  |  |  |  |  |                                     |  |                   |           |       |       |      |
|                            |              | 21 Years, 04 Months, & 13 Days |  |  |  |  |  |  |                                     |  |                   |           |       |       |      |
|                            |              | D.O.B                          |  |  |  |  |  |  |                                     |  |                   |           |       |       |      |
|                            |              | 16.04.1979                     |  |  |  |  |  |  |                                     |  |                   |           |       |       |      |
|                            |              | Education                      |  |  |  |  |  |  |                                     |  |                   | Entries:- |       |       |      |
|                            |              | 10 <sup>th</sup>               |  |  |  |  |  |  |                                     |  |                   | Bad       | Minor | Major | Good |
|                            |              | Recruit Inter:                 |  |  |  |  |  |  |                                     |  |                   | 06        | 01    | Nil   | 01   |

*Rejected*  
*(Signature)*  
*08/2/22*

*Assisted by*  
*(Signature)*  
Deputy Superintendent of Police Legal  
City Traffic Police,  
Peshawar.



18

OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

ORDER.

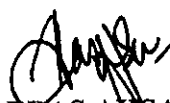
This order will dispose of the departmental appeal preferred by IHC/TO Atta Muhammad No. 43 who was awarded the minor punishment of "Stoppage of increment for the period of 02 years with cumulative effect" under PR-1975 by Chief Traffic Officer Peshawar vide order No1785-.90/PA, dated 22-12-2021.

2- Shorts facts leading to the instant appeal are that the appellant while posted at Traffic HQr: Peshawar was proceeded against departmentally on the charges that a video went viral on social media wherein it was seen that the alleged official was taking a shoes polish Dabba from a poor child free of cost who was setting on the road side.

3- He was issued proper Charge Sheet and Summary of Allegations by CTO Peshawar. SP/City Traffic Peshawar was appointed as inquiry officer to scrutinize the conduct of the accused official. The inquiry officer after conducting proper inquiry submitted his findings and recommended him for minor punishment. The competent authority in light of the findings of the inquiry officer awarded him the above minor punishment.

4- He was heard in person in O.R and the relevant record along with his explanation perused. During personal hearing the appellant failed to submit any plausible explanation in his defence. Therefore, his appeal for setting aside the punishment awarded to him by CTO Peshawar vide order No. 1785-90/PA, dated 22.12.2021 is hereby rejected/filed.

OFFICE OF THE  
CHIEF TRAFFIC OFFICER  
PESHAWAR  
Diary No. 577 End 1694/10 / 17/02/22  
Dated 18-2-2022

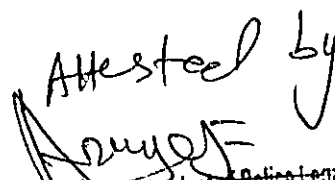
  
(ABBAS ARSAN) PSP  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

No. 420-23 /PA, dated Peshawar the 10 / 02 / 2022

Copies for information and necessary action to the:-

1. Chief Traffic Officer: Peshawar.
- ✓ 2. SP/HQr: City Traffic Peshawar. Along with complete enquiry file
3. AD-IT CCP Peshawar.
4. Official concerned.

SRC-I

Attested by  
  
Deputy Superintendent of Police Legal  
City Traffic Police,  
Peshawar.

  
CHIEF TRAFFIC OFFICER

The SSP Traffic  
Peshawar

(19)

No. 474-R  
dt. 18/06/23

Application for grant of copy of  
order in Revision by the Appellate  
Board held on 22-03-2023 of  
the applicant.

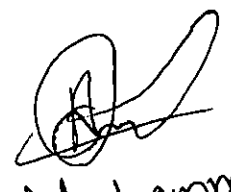
R/Shereth!

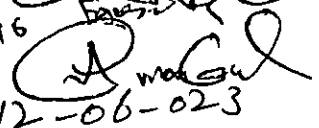
That the applicant had preferred a revision  
petition against the order of awarding  
penalty which was decided by the appellate  
Board but the copy of the same has  
not been provided to the applicant.

That the applicant needs the outcome of  
proceedings in order to litigate his matter  
or otherwise.

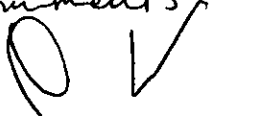
It is, therefore, respectfully submitted  
that a copy of the proceedings, if any,  
may please be provided with the copy  
of order, if any.

Regards.

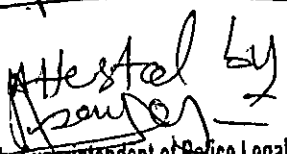


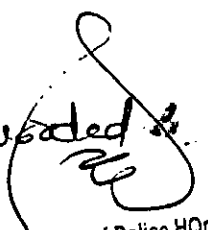
1/Case No. G.T. Road 2 II  
S/O   
12-06-23

Atta Muhammad  
IHC  
No. 43

DSP/Legal  
for comments  


Dated: 12/06/2023

w/c/o  
  
Deputy Superintendent of Police Legal  
City Traffic Police,  
Peshawar.

Sir,  
Forwarded  
  
Superintendent of Police HQrs  
City Traffic Police  
Peshawar

CHIEF TRAFFIC OFFICER,  
PESHAWAR.

No. SM-K  
dt-27/06/23

20

## NOTE SHEET

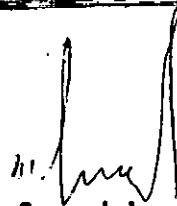
Subject: APPLICATION FOR THE GRANT OF COPY ORDER IN REVISION BY THE APPELLATE BOARD HELD ON 22.03.2023 OF THE APPLICANT

Respected Sir,

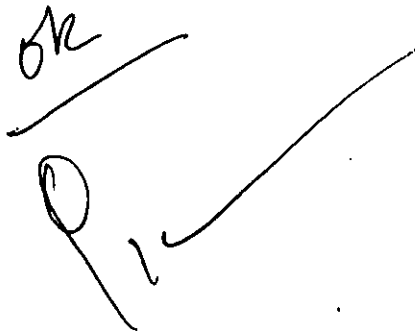
It is submitted that as per the Police Rules 1975, KP E & D Rules 2011 and Judgment of Supreme Court of Pakistan 2010 SCMR 532 "It is the duty of the concern authority to inform the accused regarding all the allegations (written papers) held against him in departmental proceedings".

Therefore, in view of the above kindly issue the relevant documents to the applicant from SRC Branch of City Traffic Police, Peshawar.

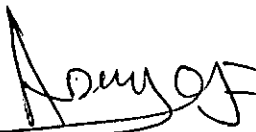
Submitted please.

  
DY; Superintendent of Police,  
Legal; City Traffic Police,  
Peshawar.

W/SEP

OK  


Attested by



Deputy - Legal  
City Traffic Police,  
Peshawar.