

BEFORE THE KHYBER PUKHTUN KHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No.2042 of 2023.

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


VERSUS

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

.....Respondents

Index

S. No.	Description of Documents	Annex	Page No.
1	Para wise comments	-	1 - 2
2	Authority Letter.		3
3	Affidavit		4
4	Counter Affidavit.		5
5	Copies of Service Roll	A 1 A 2	6-7
6	Copies of Charge Sheet, finding report and dismissal Order	B, C and D	8,9,10
7	Memory Card	E	11
	Copy of departmental enquiry	F 1 to F 30	12 to 41


District Police Officer,
Chitral Lower

28-02-2024
Peshawar
S.B.

BEFORE THE KHYBER PUKHTUN KHWA SERVICE TRIBUNAL, PESHAWAR.**Service Appeal No.2042 of 2023.**

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

.....Appellant

Khyber Pakhtunkhwa
Service TribunalDiary No. 11429Dated 28-02-24**VERSUS**

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

.....Respondents

Parawise Comments on behalf of Respondent No 2, 4 & 5.**Preliminary objections:-**

Respectfully Sheweth!

- (1) That the appeal in hand is badly time-barred.
- (2) That the appellant has not come to this Tribunal with clean hands.
- (3) That the appellant has got no cause of action to prefer the appeal at hand.
- (4) That the appeal is not maintainable in its present form.

On facts.

1. Correct only to the extent of the appellant's enrollment in police department as constable on 30.08.2013. However, Service Roll of the appellant highlights five Red entries in his account.... (Copies attached as annexure "A-I, A-2").
2. Pertains to Service period of the appellant. However, as explained vide above para, appellant's Service Record revealed that he was not exhibiting any sort of professionalism in his duties.
3. Correct that a complaint of one Mr. Amjad Ali S/O Rahmat Khan was received against the appellant for taking bribe of rupees 1,20000/- in return of the complainant's appointment in Police department. Therefore, he was Charge Sheeted with summary of allegations and Mr. Iqbal Karim DSP Head Quarter was appointed as Enquiry Officer. During course of enquiry charge of bribery and misconduct were proved against the appellant in the finding report. Thus was recommended for major punishment. Therefore, Final Show Cause Notice was issued to the appellant by competent authority and was also heard in person. However, he failed to extend any plausible defence. Therefore, he was dismissed from service as per rule... (Copies of Charge Sheet, finding report and dismissal Order are annexed as "B, C & D").
4. Correct to the extent of departmental appeals filed by the appellant which, however, was rejected as the appellant, during proceedings of the departmental appeal filed, was heard in person but he did not produced any cogent reason to defend the charges leveled against him.
5. Pertains to revision petition filed by the appellant before the Inspector General of Police, as after his departmental appeal was rejected. Consequent upon the petition, meeting of

(2)

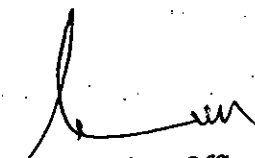
the appellate Board was held on 22.08.2023 wherein the petitioner was heard in person. However, the appellant failed to advance any plausible explanation in rebuttal of the charges. Furthermore, the Board saw no ground and reason for acceptance of the petition, therefore, the Board rejected it being devoid of merits. Then, the instant appeal of the appellant being devoid of merits and not maintainable in law, is liable to be dismissed on following grounds.

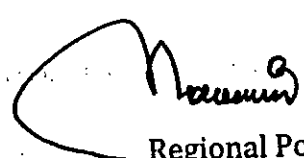
On Grounds.

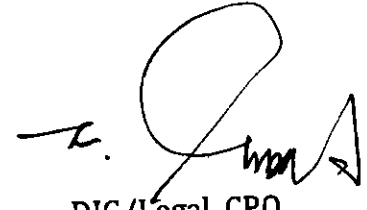
- A. Incorrect. Respondents have dealt the appellant in accordance with law, rule and justice, the referred affidavit was the outcome of a deal, just to save skin of the appellant. In his Audio call recording the appellant has categorically admitted that he has taken the said amount from the complainant..... (Memory Card attached as annexure "E").
- B. Incorrect. During proper departmental proceeding the appellant was given full chance of hearing, cross examination and defence, not only during the proper departmental proceeding but by appellate authorities as well.... (Copies attached as annexure "F 1 to F 30").
- C. Incorrect. The Respondents firstly affirmed the complaint, thereafter proceeded against the appellant departmentally, non initiation of Criminal proceeding never nullify departmental proceeding. Moreover, both are different to each other and one does not affect other, as maintained by the august Apex Court.
- D. Incorrect. Private evidence including his audio call record was produced against the appellant, the appellant badly failed to shatter the evidences, despite providing him full and fair chance of hearing, cross examination and defence, to prove his innocence during the departmental enquiry.
- E. Incorrect. The appellant has been given full chance of hearing, cross examination and defence, not only during the departmental enquiry but by appellate authority as well.
- F. Incorrect. The punishment awarded to the appellant is mandated by law, Rule and justice.
- G. Incorrect. The appellant has been given full chance of personal hearing as well.
- H. Incorrect. The penalty awarded to the appellant is valid and maintainable in the eyes of law.
- I. Incorrect. The act of the Respondent is guaranteed by law, rule and justice.
- J. Correct.
- K. That the Respondents may also be permitted to furnish additional grounds to assist this honorable Tribunal.

Prayer:

In light of the facts submitted above the appeal in hand may kindly be dismissed with cost please.


District Police Officer,
Chitral Lower
Respondent No.05
(MUHAMMAD SATTAR)
Incumbent


Regional Police Officer,
Malakand Region Swat
Respondent No.04
MUHAMMAD ALI KHAN (PSP)
Incumbent


DIG/Legal, CPO
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
Respondent No.02
(DR. MUHAMMAD AKHTAR ABBAS)
Incumbent

BEFORE THE KHYBER PUKHTUN KHWA SERVICE TRIBUNAL, PESHAWAR.**Service Appeal No.2042 of 2023.**

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

.....Appellant


VERSUS

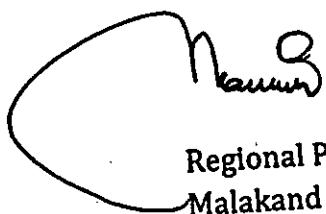
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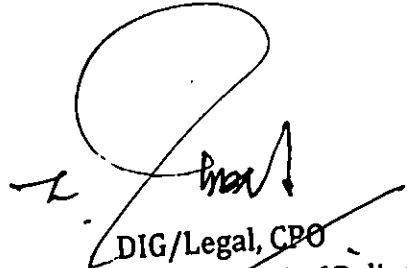
.....Respondents

Authority Letter.

Sher Mohsinul Mulk DSP Legal of District Police Chitral is hereby authorized and deputed to attend Service Tribunal, Khyber Pakhtunkhwa, Peshawar in Service Appeal No.2042 of 2023 titled Rahmat Jalil S/O Ali Rahmat, Resident of P.O Garam Chashma Village Munoor Tehsil & District Chitral as departmental representative.


District Police Officer,
Chitral Lower
Respondent No.05
(MUHAMMAD SATTAR)
Incumbent


Regional Police Officer,
Malakand Region Swat
Respondent No.04
MUHAMMAD ALI KHAN (PSP)
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DIG/Legal, CPO
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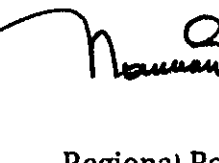
.....Respondents

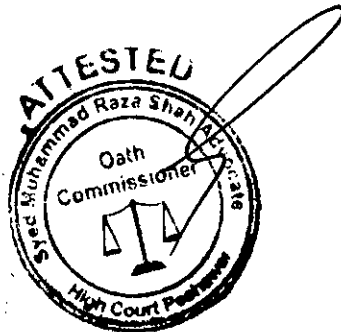
Affidavit

We the following respondents do hereby solemnly affirm that the contents of Parawise comments are true to the best of our knowledge and belief and nothing has been concealed from the Honorable 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 *lost*.


District Police Officer,
Chitral Lower
Respondent No.05
(MUHAMMAD SATTAR)
Incumbent


Regional Police Officer,
Malakand Region Swat
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MUHAMMAD ALI KHAN (PSP)
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BEFORE THE KHYBER PUKHTUN KHWA SERVICE TRIBUNAL, PESHAWAR.

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VERSUS

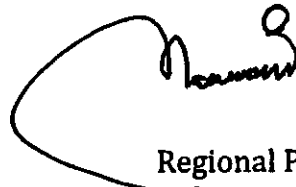
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5. District Police Officer Chitral.
6. Secretary Finance Government of K.P.K at Civil Secretariat Peshawar.

.....Respondents

Counter Affidavit.

Verified that the contents of Parawise comments/ reply are true and correct and noting have been concealed from the tribunal.


District Police Officer,
Chitral Lower
Respondent No.05
(MUHAMMAD SATTAR)
Incumbent


Regional Police Officer,
Malakand Region Swat
Respondent No.04
MUHAMMAD ALI KHAN (PSP)
Incumbent



Serial No.

15. CENSURES AND PUNISHMENT

(4) days absence period with effect from 13-8-18 to 15-8-18

Recorded as L.W.P. vide OB No: 324 dt. 15-8-18.

Punishment: 8 days
Absented from duty w. 12-8-18 to 20-8-18
Awarded punishment: 1/2 days L.W.Pay,
E. Drill O. Guard
O.B No. 96 dated 7-11-18

Supdt. of Police FRP,
Mkd. Range Swat.

Punishment Entry
Absented from duty w.e.f 22-8-18 to 26-8-18
Awarded punishment: 3 days L.W.Pay,
E. Drill O. Guard
O.B No. 101 dated 26-11-18

EC for SP, FRP,
Mkd: Range, Swat.

Absence period @ home
warned to be careful
in future. OB No 56
dt. 15-7-18

EC for SP, FRP,
Mkd: Range, Swat.

Establishment Clerk
For Supdt. of Police
FRP Mkd. Range Swat.

(05) days absence treated as warned to be careful in
future, vide OB No 78 dt. 09-01-2020

District Police Officer
Chitral

(05) days absence period treated as L.W.P
vide OB No- 379 dt. 22-07-2020

District Police Officer
Chitral

Signature

Signature

DSP Legal,
Chitral Lower

15. CENSURES AND PUNISHMENT - Contd.

Serial No.

ORDER.

Awarded Major Punishment of dismissal from Service with Immediate effect in the best interest of public and debarment vide this office order No. 3152-58/B-II, dated 14/2⁰⁶2022 due to receipt of bribe of Rs. 120,000/- from one Amjad Ali So Rehmat Khan & No. Gaurun Chashma Lower Chitral (Copy enclosed).

[Signature]
 District Police Officer
 LOWER CHITRAL

Attested

[Signature]
 DSP Legal
 Chitral Lower

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in

Nc

فائنڈنگ رپورٹ

محکمہ انکوائری برخلاف کنسٹیبل رحمت جلیل نمبر 17

جناب عالی!

بحوالہ چارج شیٹ نمبر 3/EII-2702 مورخہ 10.05.2022 مجاریہ جناب DPO افس لوئر چترال من DSP/HQ لوئر چترال کو انکوائری افس مقرر کرنے پر حسب ضابطہ کاروائی عمل میں لائی گئی۔
کاروائی:-

رحمت جلیل مذکورہ بالا محکمہ پولیس لوئر چترال میں بحیثیت کنسٹیبل ملازم ہے۔ کنسٹیبل مذکورہ بالا بحیثیت پولیس ملازم اپنے اختیارات کا ناجائز استعمال کرتے ہوئے مختلف سادہ لوح اور غیریب لوگوں سے بدینتی اور دھوکہ دہی سے ملازمت دینے کا جھانسدے کر رہا ہے۔ جس کا ثبوت کنسٹیبل مذکور نے اپنے ایڈیوریکارڈ اور اپنے بیان میں بھی اس بات کا خود اقرار ہی ہوا کہ اس نے 26 سادہ لوح لوگوں سے 5312000 روپے لیا ہے اور اپنا کمیشن لے کر چترال سکاؤٹس کے نائب صوبیدار محمد اقبال سکنہ کج پائن کو حوالہ کیا ہے۔ مگر کوئی شہادت موصول نہ ہے۔ اس طرح کنسٹیبل مذکور نے درخواستی امجد علی ولد رحمت خان سکنہ گرم چشمہ یورجوع موبائل نمبر 0341 5844483 قومی شناختی کارڈ نمبر 15201.2036468.9 سے محکمہ سکاؤٹس یا کسی دوسرے ادارے میں ملازمت دینے کا وعدہ کر کے مبلغ 120000 روپے قریب دو سال پہلے وصول کر کے تا حال درخواستی کو ملازمت دی ہے اور نہ ہی رقم واپس کر رہا ہے۔ التارقم کی وصولی کی خاطر درخواستی روز بروز نذید نقصان ہوتا آ رہا ہے۔ درخواستی اخیر کار مجبور ہو کر جناب DPO صاحبہ کو اس بابت درخواست پیش کی۔ درخواست جناب DPO صاحبہ مجھے مارک کر کے رپورٹ پیش کرنے کا حکم دے کر مجھے انکوائری افس مقرر کیا گیا۔ جس پر من DSP/HQ نے رپورٹ جناب DPO صاحبہ کو بھجوانے پر مذکورہ بالا کنسٹیبل کے خلاف چارج شیٹ جاری فرما کر مکمل انکوائری کرنے کا حکم صادر فرمائی ہے۔ جس پر کنسٹیبل رحمت جلیل نمبر 17 نے جواب چارج شیٹ اور بیان میں درخواستی سے قرض لینے کا ذکر کیا ہے اور اپنی مجبوری کا بہانہ بناتے ہوئے اور درخواستی کی شرافت سے فائدہ اٹھا کر اسٹم پیپر پر لکھوا کر پیش کرایا ہے۔ جس نے مجبوراً الزام عالیہ کے حق میں بیاں تحریر کروایا ہے کہ اس نے کنسٹیبل مذکور کو نہ قرض دیا ہے۔ حالانکہ درخواستی نے محض نوکری کی بابت کنسٹیبل مذکور کو رقم

Attested



تھا۔ درخواستی امجد علی کا دیا ہوا اسٹم پیپر اور دیا ہوا بیباں جو کہ کنسٹیبل کے حق میں دیا ہے۔ کنسٹیبل مذکور کی بددیانتی، کراپش، بدعنوانی، فراڈ اور دھوکہ دہی کے سلسلے میں بہترین ثبوت فراہم کرتے ہیں۔ اس ضمن میں دوران انکوائری مختلف لوگوں سے خفیہ معلومات حاصل کی جہاں جہاں کنسٹیبل مذکور نے ملازمت کی ہے وہاں کے متعلقین اور DSB کے ذریعے بھی معلومات حاصل کیا گیا۔ کنسٹیبل مذکور کے متعلق سے کسی بھی سائڈ سے کوئی بہترین ریمارکس دیکھنے یا سننے کو نہیں ملا۔ کنسٹیبل مذکور کے سابقہ سروس ریکارڈ چیک کیا گیا جو کہ تسلی بخش نہیں پایا گیا۔ کنسٹیبل مذکور اپنے سروس کے دوران بحیثیت پولیس افسر اپنے اختیارات کا حد سے زیادہ ناجائز استعمال کرتا آیا ہے۔ جو کہ محکمہ پولیس کے ساتھ انتہائی زیادتی اور نا انصافی تصور کیا جاتا ہے۔ کیونکہ محکمہ پولیس ایک باعزت قانونی ادارہ ہے۔ اس قسم کے بدکردار لوگوں کو محکمہ پولیس کا حصہ رکھنا نا انصافی اور زیادتی ہوگی۔ پولیس رولز 1975 اور پولیس ایکٹ 2014/2017 وغیرہ ملک میں راج قانون کے تحت ایسے لوگوں کو بے غیر کسی انکوائری اور تحقیقات کے محکمہ پولیس سے فارغ کرنے کے لیے DPOs صاحبان کے پاس بے انتہا صوابدیدی اختیارات ہیں۔ بسا اوقات جناب DPOs صاحبان کو ایسے اختیارات کو بروکار لا کر ایسے بدنام لوگوں سے محکمہ پولیس کو خلاصی دلائی جائے۔ کنسٹیبل مذکور کا بیان لیا گیا ہے اپنے بیان میں بھی لوگوں سے غیر قانونی رقم لینے کا اقرار کرتا ہے جس اڈیوریکارڈ اور تحریری بیان لف انکوائری ہیں۔ معاملہ ہذا بھی اسی نوعیت کا ہے۔ کنسٹیبل رحمت جلیل نمبر 17 کو مزید بے غیر کسی قانونی کادرائی کے بحیثیت ڈسٹرکٹ پولیس افسر اپنے صوابدیدی اختیارات استعمال کر کے محکمہ پولیس سے برخاست کرنا چاہیے۔ کیونکہ قانون کے محافظ ہوتے ہوئے کنسٹیبل مذکور نے رشوت زنی اور محکمہ پولیس کو بدنام کرنے میں کوئی کسر نہیں چھوڑا ہے۔ عین ممکن ہے کہ جن جن لوگوں سے نوکری کا جھانسدے کر رقم لیا ہے وہ بھی مذکورہ بالا کنسٹیبل کے خلاف درخواستیں دیں سکتے ہیں۔ جس سے محکمہ پولیس کی وقار کو نقصان پہنچنے قوی امکان ہے۔

لہذا کنسٹیبل رحمت جلیل نمبر 17 کو Major Punishment دینے کی سفارش کی جاتی ہے۔

ڈی۔ ایس۔ پی ہیڈ کوارٹر
لوئر چترال

Issue Final
Show cause

Attested



DSP Legal,
Chitral Lower

(10)

Annexure "G"

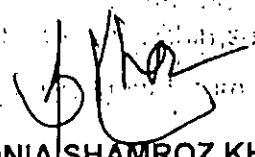
Enquiry No. 13 /E-II
Dated Chitral the 10/05 /2022

CHARGE SHEET

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


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

1. Based on the above reasons, you appear to be guilty of misconduct/inefficient, not fit for service, and have rendered yourself liable to all or any of the penalties specified in Rule -4 of the disciplinary Rules 1975 amended 2014.
2. You are therefore; required to submit your written reply within seven (07) days of receiving of this Charge Sheet to the Enquiry Officer Mr. Iqbal Karim DSP/HQ Lower Chitral.
3. Your written reply, if any, should reach to the Enquiry Officer, within the specified period, failing which it shall be presumed that you have no defense to put in and in that case Ex-parte action shall follow against you.
4. Intimate as to whether you desire to be heard in person or not?
5. A statement of Allegation is enclosed.


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

No. 2702-03 /E-II, Dated Lower Chitral the 10/05 /2022.
 Copies to:-

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

Attested

 DSP Legal,
 Chitral Lower.

ORDER

(11)

Annexure "D"

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

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

His this act/omission being a serious crime on the part of a member of Law Enforcement Agency and deforming the reputation and credibility of local Police in the eyes of public is punishable under disciplinary law/rules; hence, a departmental action under Police Rules 1956 amended 2014 was initiated against him.

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

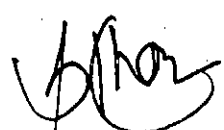
Record reveals that during the course of enquiry, the delinquent Constable Rahmat Jalil No. 17 has been given ample opportunity of hearing & defense. After proper and impartial enquiry, the Enquiry Officer found him guilty and in his finding recommended him for Maximum punishment.

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

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

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

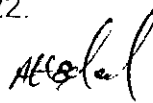
Order Announced


District Police Officer
Chitral, Lower

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

Copies to:

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


DSP Legal.
Chitral Lower.



USP Legal
Critical Lower

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Annexure

(E)

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(12)

فائنڈنگ رپورٹ

محکمہ انکوائری بر خلاف کنسٹیبل رحمت جلیل نمبر 17

جناب عالی!

بحوالہ چارج شیٹ نمبر 3/EII/2702 مورخہ 10.05.2022 مجاریہ جناب DPO افس لوئر چترال من DSP/HQ لوئر چترال کو انکوائری افس مقرر کرنے پر حسب ضابطہ کاروائی عمل میں لائی گئی۔
کاروائی:-

رحمت جلیل مذکورہ بالا محکمہ پولیس لوئر چترال میں بحیثیت کنسٹیبل ملازم ہے۔ کنسٹیبل مذکورہ بالا بحیثیت پولیس ملازم اپنے اختیارات کا ناجائز استعمال کرتے ہوئے مختلف سادہ لوح اور غیر سادہ لوحوں سے بد نیتی اور دھوکہ دہی سے ملازمت دینے کا جھانسہ دے کر رقم بٹورتا آ رہا ہے۔ جس کا ثبوت کنسٹیبل مذکور نے اپنے اڈیوریکارڈ اور اپنے بیان میں بھی اس بات کا خود اقراری ہوا کہ اس نے 26 سادہ لوح لوگوں سے 5312000 روپے لیا ہے اور اپنا کمیشن لے کر چترال سکاؤٹس کے نائب صوبیدار محمد اقبال سکھ کو پان کو حوالہ کیا ہے۔ مگر کوئی شہادت موصول نہ ہے۔ اس طرح کنسٹیبل مذکور نے درخواستی امجد علی ولد رحمت خان سکھ گرم چشمہ یوج موبائل نمبر 0341 5844483 قومی شناختی کارڈ نمبر 15201.2036468.9 سے محکمہ سکاؤٹس یا کسی دوسرے ادارے میں ملازمت دینے کا وعدہ کر کے مبلغ 120000 روپے قریب دو سال پہلے وصول کر کے تاحال درخواستی کو ملازمت دی ہے اور نہ ہی رقم واپس کر رہا ہے۔ الثاقم کی وصولی کی خاطر درخواستی روز بروز مزید نقصان ہوتا آ رہا ہے۔ درخواستی اخیر کار مجبور ہو کر جناب DPO صاحبہ کو اس بابت درخواست پیش کی۔ درخواست جناب DPO صاحبہ مجھے مارک کر کے رپورٹ پیش کرنے کا حکم دے کر مجھے انکوائری افس مقرر کیا گیا۔ جس پر من DSP/HQ نے رپورٹ جناب DPO صاحبہ کو بھجوانے پر مذکورہ بالا کنسٹیبل کے خلاف چارج شیٹ جاری فرما کر مکمل انکوائری کرنے کا حکم صادر فرمائی ہے۔ جس پر کنسٹیبل رحمت جلیل نمبر 17 نے جواب چارج شیٹ اور بیان میں درخواستی سے قرض لینے کا ذکر کیا ہے اور اپنی مجبوری کا بہانہ بناتے ہوئے اور درخواستی کی شرافت سے فائدہ اٹھا کر اسٹم پیپر پر لکھوا کر پیش کرایا ہے۔ جس نے مجبوراً الزام علیہ کے حق میں بیان تحریر کروایا ہے کہ اس نے کنسٹیبل مذکور کو قرض دیا ہے۔ حالانکہ درخواستی نے محض نوکری کی بابت کنسٹیبل مذکور کو رقم

Affected

DSP Legal,
Chitral Lower.

تھی۔ درخواستی امجد علی کا دیا ہوا اسٹم پیپر اور دیا ہوا بیایاں جو کہ کنٹریبل کے حق میں دیا ہے۔ کنٹریبل مذکور کی بددیانتی، کراپش، بدعنوانی، فراڈ اور دھوکہ دہی کے سلسلے میں بہترین ثبوت فراہم کرتے ہیں۔ اس ضمن میں دوران انکوائری مختلف لوگوں سے خفیہ معلومات حاصل کی جہاں جہاں کنٹریبل مذکور نے ملازمت کی ہے وہاں کے متعلقین اور DSB کے ذریعے بھی معلومات حاصل کیا گیا۔ کنٹریبل مذکور کے متعلق سے کسی بھی سائیڈ سے کوئی بہترین ریمارکس دیکھنے یا سننے کو نہیں ملا۔ کنٹریبل مذکور کے سابقہ سروس ریکارڈ چیک کیا گیا جو کہ تسلی بخش نہیں پایا گیا۔ کنٹریبل مذکور اپنے سروس کے دوران بحیثیت پولیس افسر اپنے اختیارات کا حد سے زیادہ ناجائز استعمال کرتا آیا ہے۔ جو کہ محکمہ پولیس کے ساتھ انتہا ہی زیادتی اور نا انصافی تصور کیا جاتا ہے۔ کیونکہ محکمہ پولیس ایک باعزت قانونی ادارہ ہے۔ اس قسم کے بدکردار لوگوں کو محکمہ پولیس کا حصہ رکھنا نا انصافی اور زیادتی ہوگی۔ پولیس رولز 1975 اور پولیس ایکٹ 2014/2017 وغیرہ ملک میں رائج قانون کے تحت ایسے لوگوں کو بے غیر کسی انکوائری اور تحقیقات کے محکمہ پولیس سے فارغ کرنے کے لیے DPOs صاحبان کے پاس بے انتہا صوابدیدی اختیارات ہیں۔ بسا اوقات جناب DPOs صاحبان کو ایسے اختیارات کو بروکار لا کر ایسے بدنام لوگوں سے محکمہ پولیس کو خلاصی دلائی جائے۔ کنٹریبل مذکور کا بیان لیا گیا ہے اپنے بیایاں میں بھی لوگوں سے غیر قانونی رقم لینے کا اقرار کرتا ہے جس اڈیوریکارڈ اور تحریری بیایاں لف انکوائری ہیں۔ معاملہ ہذا بھی اسی نوعیت کا ہے۔ کنٹریبل رحمت جلیل نمبر 17 کو مزید بے غیر کسی قانونی کارروائی کے بحیثیت ڈسٹرکٹ پولیس افسر اپنے صوابدیدی اختیارات استعمال کر کے محکمہ پولیس سے برخاست کرنا چاہیے۔ کیونکہ قانون کے محافظ ہوتے ہوئے کنٹریبل مذکور نے رشوت زنی اور محکمہ پولیس کو بدنام کرنے میں کوئی کسر نہیں چھوڑا ہے۔ عین ممکن ہے کہ جن جن لوگوں سے نوکری کا جھانسہ دے کر رقم لیا ہے وہ بھی مذکورہ بالا کنٹریبل کے خلاف درخواستیں دیں سکتے ہیں۔ جس سے محکمہ پولیس کی وقار کو نقصان پہنچنے قوی امکان ہے۔

لہذا کنٹریبل رحمت جلیل نمبر 17 کو Major Punishment دینے کی سفارش کی جاتی ہے۔

mmil,
ڈی۔ ایس۔ پی ہیڈ کوارٹر
لوئر چترال

Issue Final
show cause

Attested
DSP Legal,
Chitral Lower.

(15)

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

CHARGE SHEET

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

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

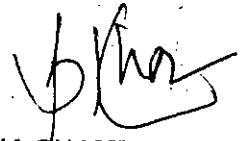
1. Based on the above reasons, you appear to be guilty of misconduct/inefficient, not fit for service and have rendered yourself liable to all or any of the penalties specified in Rule -4 of the disciplinary Rules, 1975 amended 2014.

2. You are therefore, required to submit your written reply within seven (07) days of receiving of this Charge Sheet to the Enquiry Officer Mr. Iqbal Karim DSP/HQ Lower Chitral.

3. Your written reply, if any, should reach to the Enquiry Officer, within the specified period, failing which it shall be presumed that you have no defense to put in and in that case Ex-parte action shall follow against you.

4. Intimate as to whether you desire to be heard in person or not?

5. A statement of Allegation is enclosed.


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

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

Copies to:-

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

Attested


DSP Legal,
Chitral Lower

جناب عالی!

بحوالہ چارج شیٹ نمبری EII/03-2702 مورخہ 10.05.2022 جاریہ از دفتر جناب DPO انس

لوئر چترال واپسی معروض خدمت ہوں کہ میرے خلاف چارج شیٹ بالا میں جو الزام لگایا گیا ہے وہ حقیقت پر مبنی نہ ہے۔ کیونکہ میں نے کسے سے دھوکہ دہی فرڈیا نوکری دلوانے کی عوض کوئی رقم وصول نہیں کی ہے۔ جبکہ مسمی امجد علی ولد رحمت خان سکندہ گرم چشمہ یور جوغ کے مبلغ ایک لاکھ بیس (120000) روپے بطور قرض مجھ پر واجب الادا تھے۔ لیکن کچھ گھریلوں مجبور یوں کے بنا پر بروقت ادا کرنے سے قاصر رہا۔ جس کی وجہ سے مذکورہ شخص نے میرے خلاف بے بنیاد درخواست گزار کی ہے اور حقیقت کو توڑ مروڑ کر پیش کی ہے۔ اسی نسبت مذکورہ شخص کا بیان حلفی ذریعہ نمبر 811 مورخہ 13.05.2022 واضح ہے۔ نقل لف ہے۔ یکہ مذکورہ شخص کو مذکورہ واجب الادا رقم وصول شدہ ہیں۔ جو کہ مذکورہ بیان حلفی سے بالکل واضح ہے۔ مذکور بالا حقائق سے بالکل واضح ہے کہ میں نے کسی سے کوئی دھوکہ دہی کا کوئی جھانسہ دیکر پیسے وغیرہ نہیں لی ہے۔ یکہ بطور قرض پیسے لے کر بروقت ادا کرنے سے قاصر رہا تھا۔ جو کہ اپ اداسدہ ہیں۔

اندرین حالات گزارش ہے کہ میرے خلاف چارج شیٹ ہذا بے غیر مزید کارروائی کے فائل فرمائی جا کر انصاف اور ماتحت پروری فرمائی جائے۔

Resat

کنشیل رحمت جلیل نمبر 17

mob:03451272836

CNIC No:15201.1052353.5

Attested

DSP Legal,
Chitral Lower.

DSP Legal,
Chital Lower

Attested

17-05-2022

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- 1 X X

17-05-2022

CMIC No - 15201-1052353-5

Mob - No: 0354-1272836

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17

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District Police Officer
LOWER CHITRAL

report within
5 days

Inquire and

DSP Legal,
Chitral Lower.

(18)

No 12

Ahmed

نہیں ہوا ہے جس پر میں نے مذکورہ ٹائٹ ہوئیدار سے رابطہ کر کے ہر
 رابطہ نہ ہو سکا جس پر میں درخواستی اچھی ملنے کے طوروں میں قصوردار
 کھنڈرا میں نے درخواستی کو سمجھانے کی بار بار کوشش کی مگر مطلوبہ
 ہوئیدار سے رابطہ ہونے پر اس سے ادارہ رقم لے کر آج
 کو ادا کروں گا۔ اگر مطلوبہ ٹائٹ ہوئیدار سے ادارہ رقم و اس
 نہ لے سکا تو میں اپنی تنخواہ میں سے ہر جیسے مستطوار ادا کرنا ہوں گا۔
 درخواستی نے دنا۔ ڈی۔ بی۔ او صاحبہ کو درخواست گزار نے ہر
 سیرے ندف انکو ابڑی کر کے لکھے سیرت سیرا کی نوید سنا نے ہر میں
 نے دوبارہ درخواستی سے رابطہ کیا جس پر درخواستی بھی سیرے ندف
 حکمانہ سیرا سے گریزاں ہے۔ اس بابت میں درخواستی سے عمل کر
 مذکورہ رقم ہر جیسے اپنی تنخواہ میں مستطوار ہی الوسح ادا کرنے کی
 یقین دہانی کرانے پر درخواستی بھی مطمئن ہو کر اپنے درخواست ہر فریڈ
 کسی قسم کی حکمانہ و قانونی کاروائی نہ کرنے کا جواب دیا ہے۔
 لہذا میں سیرے ندف درخواستی کا درخواست بدلہ کاروائی قابل
 فریڈ جا کر عین مالیت ہر ردی فرمائی جائے۔ لہذا یہ سیرا یہاں ہے جو
 کم درست ہے۔



15201-1052353-5

0345-1272836

13-05-2022

Mir Muhammad Shah
Advocate/Oath Commissioner
Distt. Court Chitral

Mir Muhammad Shah

Mir Muhammad Shah

13/5/2022

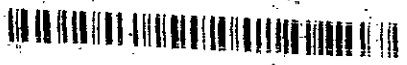
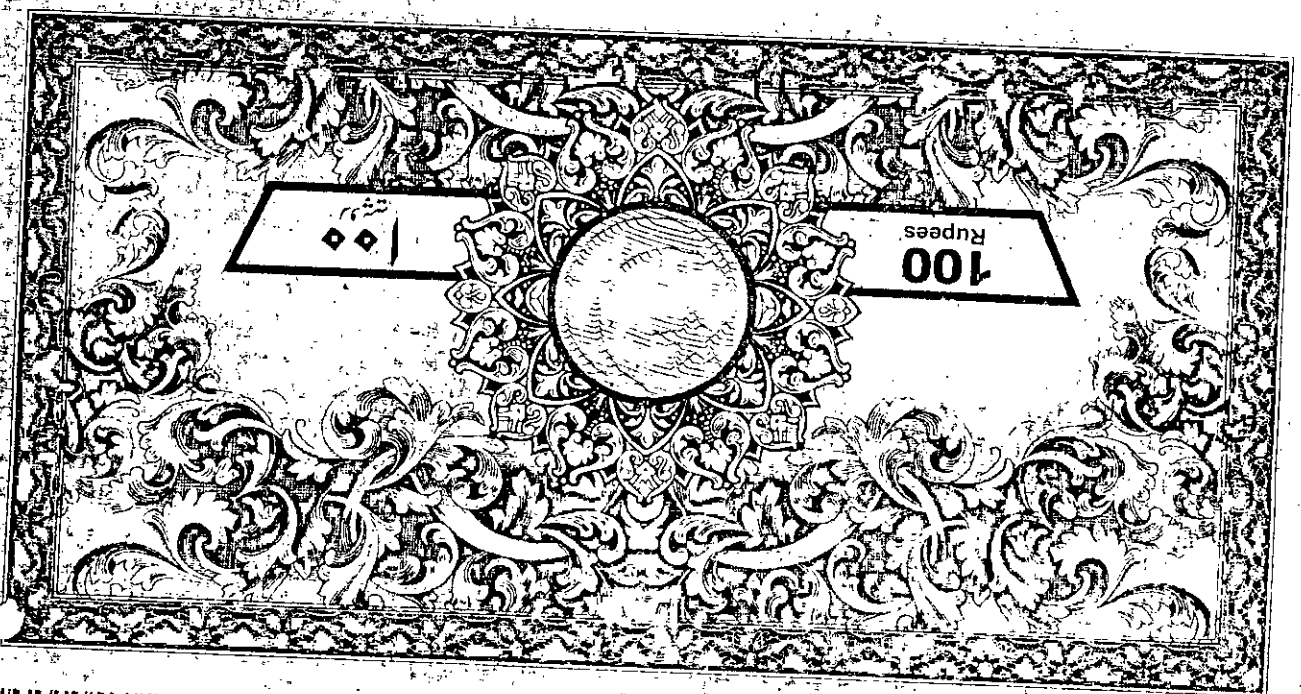
DS Legal,
Chitral Lower

Attested

Mir Muhammad Shah

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6653086

21 APR 2022
TAX ACCOUNTS OFFICE

RECEIVED
TAX SERVICES
APR 21 2022

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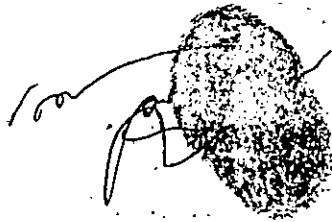
811
18/05/2022

Chitra Lower
88P Legal,

[Signature]
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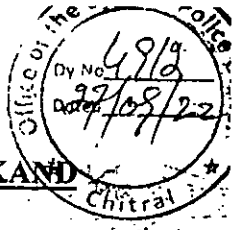
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287



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

ORDER

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

Brief facts of the case are that as per complaint of complainant namely Amjad Ali S/O Rahmat Khan R/O Garam Chashma, Lower Chitral, the appellant received bribe of Rs.120,000/- from complainant on the pretext of his appointment/recruitment in police department. The appellant is 06 times previous convicted during his 09 years service. He was given full opportunity and being heard, all legal and codal formalities have been complied with, but during the enquiry he not only failed to negate the charges leveled against him and prove himself innocent rather he confessed his guilt of taking bribe from the complainant and 25 other peoples, total amount of which is 5.312.000/-, on the pretext of their appointment in Chitral Police. Being in Law Enforcing Agency his conduct in criminal activities amounts gross misconduct and condemnable in the eyes of law and has badly affected the image of Police in public. The grounds and objections raised in the appeal by the appellant are totally irrelevant in departmental proceeding and in disciplinary action under Police Rules. Such arguments and grounds are not considerable. The appellant was convicted in light of evidence; facts and circumstance by District Police Officer, Lower Chitral office order No.3652-58/E-II, dated 14-06-2022, as the appellant could not produce any cogent reason in his defense. His case was thoroughly perused and found that he has been proved guilty during the enquiry.

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

Attested

*OT/C,
For narration*

[Signature]
Dsp Legal
Chitral Lower
No. 9963 /E,
Dated 19-9-2022.

[Signature]
Regional Police Officer,
Malakand Region Swat
District Police Officer
LOWER CHITRAL
27/9/22

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

*Encl. S: Roll
Enquiry file
Memory Card*

DSP Legal,
Chitral Lower,

District Police Officer
LOWER CENTRAL

Attested

11/09/2023

ذریعہ تحریر سے (مکمل)

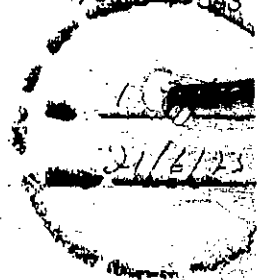
رکھ

Allowed as per

مکمل تحریر سے ذریعہ تحریر سے
ذریعہ تحریر سے ذریعہ تحریر سے
ذریعہ تحریر سے ذریعہ تحریر سے
ذریعہ تحریر سے ذریعہ تحریر سے

30

311



TELETYPE MESSAGE

FROM () PESHAWAR POLICE
 TO () THE CAPITAL CITY POLICE OFFICER, PESHAWAR () BY HAND
 THE ADDL. IG ELITE FORCE, KHYBER PAKHTUNKHWA, PESHAWAR () BY HAND
 THE COMMANDANT, FRP, KHYBER PAKHTUNKHWA, PESHAWAR () BY HAND
 THE SP/FRP, KOHAT REGION, PESHAWAR REGION ()
 THE DPO, MANSHERA, MOHMAND, LOWER CHITRAL, KOHAT, SWAT, BAHANGU, LAKKI MARWAT, DIR UPPER ()

Dr. No. 4439
 Dt. 22-06-20
 Office of the Superintendent of Police
 Lower Chitral

NO. SI 1686 /23, DATED PESHAWAR 21-06-2023 () SUBJECT () DEPARTMENTAL APPELLATE BOARD MEETING () MEMO: THE FOLLOWING APPELLANTS OF YOUR UNFDIST MAY PLEASE BE INFORMED TO ATTEND THE DEPARTMENTAL APPELLATE BOARD MEETING SCHEDULED TO BE HELD ON 22.06.2023 AT 11:00 AM IN CPO IN CONNECTION WITH THE APPEALS/REVISION PETITIONS ()

1. Ex-FC Akhtar Gul No. 1225 of District Nowshera
2. Ex-FC Zia-ur-Rahman No. 3039 of District Swat/Elite Force
3. Ex-FC Abdul Hadeed No. 3762 of Elite Force
4. Ex-FC Jawad No. 910 of District Mohmand
5. FC Mohsin No. 383 of District Manshra
6. Ex-recruit FC Nacem Gul No. 5451 of FRP, Kohat Range
7. Ex-recruit FC Hassan Waheed No. 5358 of FRP Kohat Range
8. IIC Araf Hussain No. 289 of District Manshra
9. FC Hasnain Habib No. 389 of District Kohat
10. Ex-Lady FC Banata No. 4430 of District Swat
11. Ex-IIC Khanwada No. 550 of District Kohat
12. Ex-FC Zaeshan Haroon No. 1226 of District Manshra
13. Ex-FC Anwar Hussain No. 796 of District Hangu
14. IIC Muhammad Tariq No. 1380/1634 of District Swat/Dir Upper
15. IIC Umar Rahman No. 2279/328 of District Swat/Dir Upper
16. Ex-IIC Muhammad Ilyas No. 102 of CCP Peshawar
17. Ex-FC Rahmat Jalil No. 17 of Lower Chitral
18. Ex-FC Sheraf Khan No. 2553 of FRP Peshawar
19. IIC Niaz Ali No. 213 of District Bannu
20. Ex-FC Muhammad Khan No. 1780 of FRP Peshawar
21. Ex-IIC Rehmat Ullah No. 3995 of CCP Peshawar
22. Ex-Lady FC Rukhsana Bibi No. 145 of District Lakki Marwat

9/9/96 16
 21-06-2023
 IIC, Swat
 Dir Upper
 Manshra
 Chitral
 Lower
 Dir Upper

off

for 3/9/23

Handwritten signature

District Police Of LOWER CHITRAL

22/6/23

Attested

Handwritten signature

DSP Legal, Chitral Lower

Handwritten signature and number 21106

REGISTRAR, FOR INSPECTOR GENERAL OF POLICE, KHYBER PAKHTUNKHWA, PESHAWAR.

NO. SI 1686 /23

Received 5/4/23

Memory Card
Engineering file

Allowed as per law
✓

DSP Legal
Chitral Lower

Attest

17/12/2017
Chitral
Ex

Handwritten notes in Urdu script, including:
- چیترا کے لیے
- چیترا کے لیے
- چیترا کے لیے
- چیترا کے لیے
- چیترا کے لیے

Handwritten signature or initials

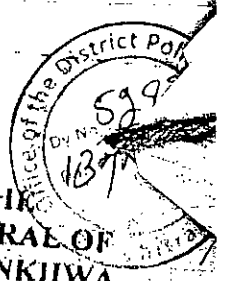


34

3544/E

11/10/22

No: SI 2239



OFFICE OF THE INSPECTOR GENERAL OF KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.
12, dated Peshawar the 13/10/2022.

To: The Regional Police Officer,
Malakand at Saidu Sharif, Swat.

Subject: APPLICATION FOR RE-INSTATEMENT IN SERVICE.

Memo:

Ex-FC Rahmat Jalil No. 17 of Lower Chitral District Police has preferred application to the Worthy IGP/Khyber Pakhtunkhwa for re-instatement in service. In order to proceed further in the matter, a copy of his punishment order and appeal rejection order may be sent to this office, please.

OHC
For info action.

[Signature]
DISTRICT POLICE OFFICER
LOWER CHITRAL
12/10/22

[Signature]
30/10/22
(AFSAR JAN)
Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
17:30-22

No 11242
Dt 12-10-22
Attested

Exl DPO lower Chitral
For info action as directed please

[Signature]
DSP Legal,
Chitral Lower.

[Signature]
Regional Police Officer,
Malakand Region,
Saidu Sharif, Swat.
7/22

Enquiry file
Memo Card



35

**DISTRICT POLICE OFFICER
LOWER CHITRAL**

Khyber Pakhtunkhwa

Email: dpochitral@gmail.com

Ph.No: 0943-412077 Fax No: 0943-412228

No. 6729 /E-II, dated 13 / 10 / 2022

To,

The Regional Police Officer,
Malakand at Saidu Sharif Swat.

Subject: -

APPLICATION FOR RE-INSTATEMENT IN SERVICE

Memo:-

Kindly refer to Region Office Endst: No. 11242/E, dated 12.10.2022
on the subject cited above.

It is submitted that copy of punishment order and appeal rejection
order of EX-Constable Rahmat Jalil No. 17 of this District Police are attached herewith
please.

Encl: 02 pages.

Attest

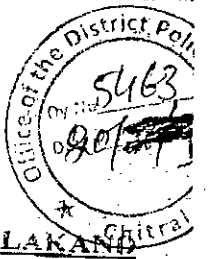
o/c

[Signature]
District Police Officer
Chitral, Lower

[Signature]
DSP Legal,
Chitral Lower.

Enquiry File
Memo of Case

36



OFFICE OF THE
REGIONAL POLICE OFFICER, MALAKAND
AT SAIDU SHARIF SWAT.
Ph: 0946-9240388 & Fax No. 0946-240390
Email: rbmalakandregion@gmail.com

No. 11695-96 /E, dated Saidu Sharif the 20 / 10 / 2022

The Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
Subject: APPLICATION FOR RE-INSTATEMENT IN SERVICE
Memorandum:

Kindly refer to CPO, Peshawar Memo: No.S/2239/22, dated 03-10-2022 on the subject.

The requisite documents i.e. copy of punishment order vide District Police Officer, Lower Chitral Endst: No.3652-58/E-II dated 14-06-2022 and a copy of appeal rejection order vide this office Memo: No.9963/E, dated 19-09-2022 in respect of Ex-Constable Rahmat Jalil No.17 of Lower Chitral District are submitted herewith as desired, please.

Encls: (As above) (2)


Endst: No. & dated even

Copy to the District Police Officer, Lower Chitral for information with reference to this office Memo: No.6729/E-II, dated 13-10-2022.

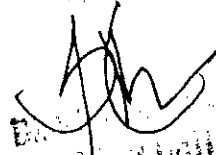
Attated


DSP Legal
Chitral

OHC


Regional Police Officer,
Malakand Region Swat

For info: 3
in action.


DISTRICT POLICE OFFICER
LOWER CHITRAL
20/10/22

Emergency File
Memory Card



371

**DISTRICT POLICE OFFICER
LOWER CHITRAL**

Khyber Pakhtunkhwa

Email: dpochitral@gmail.com

Ph. No: 0943-412077 Fax No: 0943-412228

No. 7095 /E-II, dated 29 / 11 /2022

To,

The Regional Police Officer,
Malakand Region at Saidu Sharif, Swat.

Subject: **COMMENTS**

Memo:

Kindly refer to Region office Endst: No. 13100/EC, dated 23.11.2022 on the subject cited above.

The requisite comments are as under:

1. That the contents of appeal are based on conjectures and not based on facts on record. As per complaint of complainant namely Amjad Ali S/O Rahmat Khan R/O Garum Chashma, Lower Chitral; the appellant received bribe of RS. 120,000/- from him on the pretext of his appointment / recruitment in Police Department.
2. He has 06 bad entries during his 09 years' service.
3. He was given full opportunity of hearing, all legal and codal formalities have been complied with, but during the enquiry he not only failed to negate the charges leveled against him and prove himself innocent but also confessed his guilt of taking bribe from the complainant and 25 other peoples, total amount of which is 5,312,000/-, on the pretext of their appointment in Chitral Police.
4. That being in Law Enforcing Agency his conduct / criminal activities amounts gross misconduct and condemnable in the eyes of law and has badly affected the image of police in public.
5. That the grounds and objections raised in the appeal by the appellant are totally irrelevant in departmental proceeding and in disciplinary action under police Rule. Such arguments and grounds are not considerable.
6. That during the enquiry the charges against the appellant were proved beyond any reasonable doubt.

The appellant was convicted in light of evidence; facts and circumstance by this office vide order No.3652-58 /E-II, dated 14.06.2022, as the appellant could not produce any cogent reason in his defence. His case was thoroughly perused and found that he has been proved guilty during the enquiry.

Moreover, his appeal for re-instatement in to the service has also been dismissed by the then Regional Police Officer Malakand vide Region office Order No9963/E, dated 19.09.2022.

Keeping such a corrupt minded person in the force is detrimental both for the Force and for the general public.

Therefore, keeping above mentioned in view, authority concerned may kindly be requested to set aside his appeal in the best interest of the discipline of the force.

Moreover, the above mentioned ex Constable has not instituted a service appeal in Service Tribunal so far.

His service record alongwith copy of enquiry file is also send herewith as directed please.

Submitted please.

Attested

DSP Legal,
Chitral Lower.

District Police Officer,
Chitral Lower O/C

محضور جناب انسپکٹر جنرل پولیس خیبر پختونخواہ پشاور

عنوان :- اپیل رحم بر خلاف حکم جناب ریجنل پولیس افسر ملاکنڈ سوات

زیر آرڈر نمبری 9963/E مورخہ 19.09.2022 کہ جس کی رو سے اپیلانٹ کی اپیل خارج کر دی گئی ہے

جناب عالی!

اپیلانٹ حسب ذیل عرضی پر دانا ہے۔

یہ کہ اپیلانٹ بحیثیت کنشیل عرصہ تقریباً 09 سالوں سے محکمہ ہذا میں ڈیوٹی بطریق احسن سرانجام دی ہے اور اسی دوران کسی افسر کو کسی قسم کی شکایت کا موقع نہیں دی ہے۔ یہ کہ اپیلانٹ کے خلاف ایک بے بنیاد الزام کی بناء پر کہ سائل نے درخواستی سے دھوکہ دہی اور فراڈ کر کے نوکری دلوانے کا جھانسہ دے کر مبلغ ایک لاکھ بیس ہزار (120000) لیا ہے۔ جس پر میرے خلاف انکوآری کی گئی اور بغیر کسی شہادت کے سائل کی شہادتوں کو یکسر مسترد کرتے ہوئے شہادتوں کے برعکس فیصلہ سنا۔ تے ہوئے اپیلانٹ کو نوکری سے برخاست کی ہے۔ حالانکہ دوران انکوآری درخواستی نے خود تحریری طور پر بیان حلفی انکوآری افسر کو دی تھی کہ درخواستی کا اپیلانٹ پر مبلغ ایک لاکھ بیس ہزار روپے بطور قرض واجب الادا تھے تاکہ بطور رشوت وغیرہ (نقل بیان حلفی اف ہے) یکہ مذکورہ الزام کے علاوہ اپیلانٹ کے خلاف کوئی ایسا الزام یا شہادت یا دعواداری موجود نہیں کہ جس کی بنیاد پر اپیلانٹ کے خلاف کارروائی کر کے اپیلانٹ کو نوکری سے برخاست کی جاسکے۔ مذکورہ بالا حقائق سے بالکل واضح ہے کہ اپیلانٹ کے خلاف ایک بے بنیاد الزام کی بناء پر نہ صرف محکمہ کارروائی عمل میں لائی گئی۔ بلکہ شہادتوں اور حقائق کے برعکس فیصلہ سنانے ہوئے اپیلانٹ کو غیر قانونی طور پر نوکری سے برخاست کیا گیا۔ یکہ مذکورہ حکم شہادتوں اور حقائق کے برعکس ہونے کے بناء پر غیر قانونی، غیر آئینی، غیر شرعی، ناقابل عمل اور قابل منسوخی ہے۔ یکہ مذکورہ آرڈر کے خلاف جناب ریجنل پولیس افسر صاحب ملاکنڈ کو اپیل کرنے پر صاحب موصوف نے اپیل خارج کر دی ہے۔

اندریں حالات گزارش ہے کہ اپیلانٹ کے خلاف جناب ڈسٹرکٹ پولیس افسر چترال لوئر کے حکم نمبری 3652-58/E/II مورخہ 14.06.2022 کے جس کی رو سے اپیلانٹ کو نوکری سے برخاست کیا گیا ہے اور جناب ریجنل پولیس افسر صاحب ملاکنڈ کے آرڈر نمبری 9963/E مورخہ 19.09.2022 کہ جس کی رو سے سائل کی اپیل خارج کر دی گئی ہے کو کاعدم اور منسوخ فرما کر سائل کو دوبارہ نوکری پر بحال فرما کر انصاف پسندی اور ماتحت پروری فرمائیں۔ سائل بیمار، ضعیف العمر والدین کا سہارا اور گھر کا واحد کیشل ہے۔

Attested

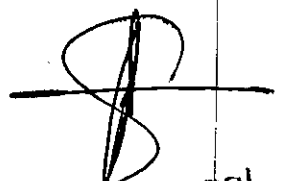
Rasul

العارض :- برخاست شدہ کنشیل رحمت طلیل نمبر 17

ڈسٹرکٹ پولیس لوئر چترال

0345 4272 836

Office of the PPO K-F, Peshawar
 (General Division)
 Dy. No. of 1388/22
 Date: 29/09/22


 DSP Legal,
 Chitral Lower.
 28/09/22

General of Police Khyber Pakhtunkhwa	
<input type="checkbox"/> Addl. IGP Hqs.	<input type="checkbox"/> AIG Training
<input type="checkbox"/> Addl. IGP (Ops)	<input type="checkbox"/> AIG OPS
<input type="checkbox"/> Addl. IGP (Inv)	<input type="checkbox"/> AIG NMTS
<input type="checkbox"/> DIG IAB	<input type="checkbox"/> AIG Logistics
<input type="checkbox"/> DIG Hqs.	<input type="checkbox"/> AIG Welfare
<input type="checkbox"/> DIG (Ops)	<input type="checkbox"/> SP Asst.
<input type="checkbox"/> Comdt SSU	<input type="checkbox"/> O&C
<input type="checkbox"/> Comdt Elite Force	<input type="checkbox"/> IGP Asst.
<input type="checkbox"/> DIG FRP	<input type="checkbox"/> DSP Asst.
<input type="checkbox"/> DG PCU	<input type="checkbox"/> PSO Asst.
<input type="checkbox"/> DIG Training	<input type="checkbox"/> Engin. and
<input type="checkbox"/> DIG Inv (Admin)	<input type="checkbox"/> Discipline
<input type="checkbox"/> DIG SPL	<input type="checkbox"/> Registrar
<input type="checkbox"/> DIG Traffic	<input type="checkbox"/> PA to IGP
<input type="checkbox"/> Dir R & A	<input type="checkbox"/> Work Sp.
<input type="checkbox"/> AIG Estb.	<input type="checkbox"/> AIG Ingt
Signature _____	
Date _____	

39



4/27/12
22/11/22

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.

No. S/ 2772 /22, dated Peshawar the 15/11/2022.

To: The Regional Police Officer,
Malakand.

Subject: - REVISION PETITION.

Memo:

Enclosed please find herewith a revision petition submitted by Ex- FC Rahmat Jallil No. 17 of Dir Lower for re-instatement in service, for recording of your para-wise comments.

His service record alongwith copy of complete enquiry file may also be sent to this office as early as possible in connection with his revision petition.

It may please be clarified that whether he has instituted a service appeal in service Tribunal or otherwise.

District Police Officer
6193
25/11/22

Attested

DSP Legal,
Chitral Lower.

15/11
(AFSAR JAN)
Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

No. 13100 /E
Date 23-11-2022

Eef DPO lower Chitral

For n/ action and report
as directed pl

OHC
FOR n/ action

CHIEF
CENTRAL
25/11/22

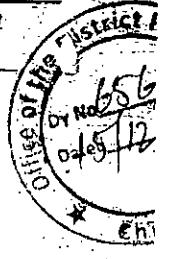
Regional Police Officer, 18-11-22
Malakand Region,
Sudu Khari, Swat.



401

OFFICE OF THE
REGIONAL POLICE OFFICER, MALAKAND
AT SAIDU SHARIF SWAT.
Ph: 0946-9240381 & Fax No. 0946-9240390
Email: digmalakand@yahoo.com

No. 14085-86 /E, dated Saidu Sharif the 14 / 12 /2022



To: The Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
Subject: REVISION PETITION

Memorandum

Kindly refer to CPO, Peshawar Memo: No.2772/22, dated 15/11/2022.

The requisite comments as intimated by District Police Officer, Lower Chitral vide his office Memo No. 7095 E-II, dated 29/11/2022 are submitted as under:-

Brief facts of the case are as per complaint of complainant namely Amjad Ali s/o Rahmat Khan r/o Garun Chashma, Lower Chitral, the appellant received bribe of Rs. 120000/- from complainant on the pretext of his appointment/recruitment in police department. The appellant is 06 times previous convicted during his 09 years service.

He was given full opportunity of being heard, all legal and codal formalities have been complied with, but during the enquiry he not only failed to negate the charges leveled against him and prove himself innocent rather he confessed his guilt of taking bribe from the complainant and 25 other peoples, total amount of which is 5,312,000/- on the pretext of their appointment in Chitral Police.

Being in Law Enforcing Agency his conduct his criminal activities amounts gross misconduct and condemnable is the eyes of law and has badly affected the image of Police in public. The grounds and objections raised in the appeal by the appellant are totally irrelevant in departmental proceeding and in disciplinary action under Police Rules. Such arguments and grounds are not considerable.

The appellant was convicted in light of evidence, facts and circumstance by DPO Lower Chitral office order No. 3652-58/E-II, dated 14/06/2022, as the appellant could not produce any cogent reason in his defense. His case was thoroughly perused and found that he has been proved guilty during the enquiry.

Later on he was submitted an appeal before this office, for re-instatement into service, he was called in orderly room on 07/09/2022 and heard him person but he did not produce any cogent reason in his self defense therefore, his appeal was rejected vide this office order Indst: No. 9963/E, dated 19/09/2022.

The District Police Officer, Lower Chitral further intimated that keeping such a corrupt minded person in the force is detrimental both for the Force and for the general public

Therefore, keeping in above mentioned in view, authority concerned may kindly be requested to set aside his appeal in the best interest of the discipline of the force.

Moreover, the above mention Ex-Constable has not instituted a service appeal in Service Tribunal so far.

Submitted for your kind perusal please.

Enclosed: (Service Rule and enquiry papers (20) pages)

Copy to District Police Officer, Lower Chitral with reference to his office memo: No. quoted above.

Attestd
DBP Legal,
Chitral Lower

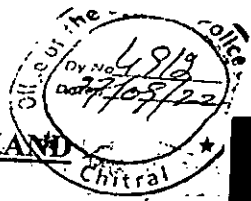
OHC
FOR INFO:
District Police Officer
LOWER CHITRAL
15/12/22

Regional Police Officer,
Malakand, at Saidu Sharif Swat

287



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



ORDER

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

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

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

OT/C
For inaction

Madam
District Police Officer
LOWER CHITRAL

Z. Aslam
Regional Police Officer,
Malakand Region Swat

27/9/22

Affected

DSP Legal
Chitral Lower

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

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

Encl: S. Roll
Enquiry file
Memory Card



29/

Dy. No. 5307
Dt. 02-08-2023
Office of the District Police Officer
Lower Chitral

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted **Ex-FC Rahmat Jalil No. 17**. The petitioner was dismissed from service vide Order Endst: No. 3652-58/E-II, dated 14.06.2022, as per complaint of complainant namely Amjad Ali S/O Rahmat Khan R/O Garam Chashma, Lower Chitral, the appellant received Bribe of Rs. 120,000/- on pretext of his recruitment in Police Department. The appellant is 06 times previous convicted during his 09 years' service. During enquiry the appellant confessed of taking Bribe from 25 other peoples; total amount of which is 5,312,000/- on the pretext of recruiting them in Chitral Police.

The Appellate Authority i.e. Regional Police Officer Malakand rejected his petition vide Order Endst: No. 9963/E; dated 19.09.2022.

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

Perusal of enquiry papers reveals that the allegations leveled against the petitioner have been proved. During hearing, petitioner failed to advance any plausible explanation in rebuttal of the 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.

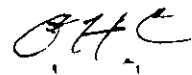
No. SI 1704-07 03, dated Peshawar, the 21-07-2023.


Copy of the above is forwarded to the:

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

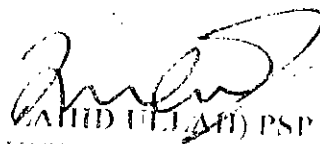
Attested


**DSP Legal,
Chitral Lower.**


FOR 299.


**District Police Officer
LOWER CHITRAL**

21/8/2023


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

FINAL SHOW CAUSE NOTICE

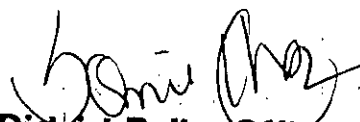
Whereas you Constable Rahmat Jalil No. 17, Posted Police Station Shoghore, as per complaint of the applicant namely Amjad Ali S/O Rahmat Khan R/O Garum Chashma Chitral Lower you received bribe of RS 120,000/- from the complainant on the pretext of his appointment / recruitment in Police Department. Your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

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

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

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

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


District Police Officer,
Lower Chitral

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

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

Attested



DSP Legal,
Chitral Lower

24/

FINAL SHOW CAUSE NOTICE

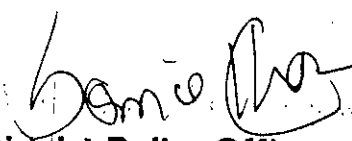
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The Enquiry Officer after proper & impartial enquiry has found you guilty of misconduct and in his finding has recommended you for major punishment.

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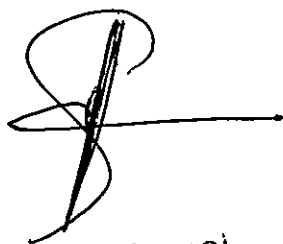
Your written reply if any should reach to the undersigned within (3) days of the receipt of this final show cause notice, otherwise it shall be presumed that you have no defence to put in and in that case an ex-party action shall be taken against you. (Copy of finding report is also attached).


**District Police Officer,
Lower Chitral**

No. 3021-22 /E-II, dt 27-05-2022

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

Attested



**DSP Legal,
Chitral Lower.**

جناب عالی!

بحوالہ فائل چارج شیٹ نمبری EII/3021 مورخہ 27.05.2022 مجاریہ از دفتر جناب DPO افس
 لوئر چترال واپسی معروض خدمت ہوں کہ میرے خلاف چارج شیٹ بالا میں جو الزام لگایا گیا ہے وہ حقیقت پر مبنی
 نہ ہے۔ کیونکہ میں نے کسی سے دھوکہ دہی فرڈ یا نوکری دلوانے کی عوض کوئی رقم وصول نہیں کی ہے۔ جبکہ مسمی امجد علی
 ولد رحمت خان سکنہ گرم چشمہ یو جوغ کے مبلغ ایک لاکھ بیس (120000) روپے بطور قرض مجھ پر واجب الادا
 تھے۔ لیکن کچھ گھریلوں مجبوریوں کے بنا پر بروقت ادا کرنے سے قاصر رہا۔ جس کی وجہ سے مذکورہ شخص نے میرے
 خلاف بے بنیاد درخواست گزارا ہے اور حقیقت کو توڑ مروڑ کر پیش کیا ہے۔ اسی نسبت درخواستی اشکایت کنندہ کا
 بیان حلفی زیر نمبر 811 مورخہ 13.05.2022 واضح ہے۔ جس کی نقل لف انکوائری کی گئی ہے۔ یکہ مذکورہ
 شخص کو مذکورہ واجب الادا رقم وصول شدہ ہیں۔ جو کہ مذکورہ بیان حلفی سے بالکل واضح ہے۔ مذکور بالا حقائق سے
 بالکل واضح ہے کہ میں نے کسی سے کوئی دھوکہ دہی کا کوئی جھانسدیکر پیسے وغیرہ نہیں لی ہے۔ یکہ بطور قرض پیسے
 لے کر بروقت ادا کرنے سے قاصر رہا تھا۔ جو کہ اپنا ادا شدہ ہیں۔

اندرین حالات گزارش ہے کہ میرے خلاف مذکورہ درخواستی کے خاتل فرمائی جا کر انصاف
 اور ماتحت پروری فرمائی جائے۔

Raza

کنشیل رحمت جلیل نمبر 17

mob: 03451272836

CNIC No: 15201.1052353.5

Dismiss from service

14 June

Attested

DSP Legal,
Chitral Lower.

ORDER

26

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

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

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

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

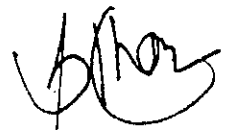
Record reveals that during the course of enquiry, the delinquent Constable Rahmat Jalil No. 17 has been given ample opportunity of hearing & defense. After proper and impartial enquiry, the Enquiry Officer found him guilty and in his finding recommended him for Major punishment.

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

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

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

Order Announced.


District Police Officer
Chitral, Lower

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

Copies to:

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




DSP Legal,
Chitral Lower.

جناب عالی۔

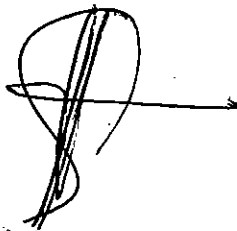
مودبانہ گزارش ہے کہ فدوی کو مورخہ 14.06.2022 کو بعد از انکوائری ملازمت سے برخاست کیا گیا ہے۔ فدوی اپنی برخواستگی کے خلاف جناب ڈی۔ آئی۔ جی۔ صاحب ملاکنڈ، سید و شریف سوات میں اپیل کرنا چاہتا ہوں۔
جناب استدعا ہے کہ فدوی کے ڈسمل آرڈر دینے کا حکم صادر فرمائیں۔

مورخہ گزارش مورخہ 14.06.2022 مورخہ 14.06.2022

Ex-FC رحمت جلیل نمبر 17

تاریخ 21/06/22

Allowed as per rules
Attested



ESP Legal,
Chitral Lower