

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.

Service Appeal No. 2462/2023

Muhammad Saeed (Appellant)

Versus

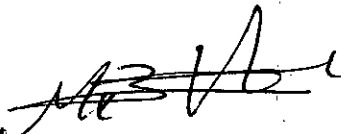
Inspector General of Police Khyber Pakhtunkhwa and others..... (Respondents)

INDEX

S.NO.	DESCRIPTION OF DOCUMENTS	ANNEXURE	S. NO. OF PAGES
1.	Index	-	1
2.	Para Wise Comments	-	2 to 3
3.	Affidavit	-	4
4.	Authority Letter	-	5
5.	Copy of suspension Order	A	6
6.	FIR No.09	B	7
7.	Copy of charge Sheet /Summary of allegation	C	8-9
8.	Serving and reply of charge sheet and statement of allegations	D	10
9.	Enquiry report	E	11
10.	FIR No.10	F	12-14
11	Dismissal order	G	15
#	Total	-	15

DEPONENT

28-03-24
Peshawar
S.B


DSP Khyber

CNIC No.

Mobile No.

2

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.

Service Appeal No. 2462/2023

Muhammad Saeed (Appellant)

Versus

Inspector General of Police Khyber Pakhtunkhwa and others..... (Respondents)

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO.01 TO 03 Khyber Pakhtunkhwa
Service Tribunal

RESPECTFULLY SHEWETH:

Diary No. 11515

PRELIMINARY OBJECTION:-

Dated 1-03-24

- a) That the Appellant has got no cause of action to file the present Appeal.
- b) That the Appeal is not based on facts.
- c) That the Appeal is not maintainable in the present form.
- d) That the Appeal is bad for non-joinder and miss-joinder of necessary parties.
- e) That the Appellant has not come to this Honorable Tribunal with clean hands
- f) That the Appellant is estopped by his own conduct to file the Appeal.
- g) That the Appeal is barred by law and limitation.

FACTS:

1. Incorrect, appellant was suspended vide order No. 884-89/PA-DPO Khyber dated 21.03.2022, on account of his involvement in Case FIR No. 09 U/S 9D –CNSA,11A CNSA dated 07.03.2022, of Police Station central mishti mela, District Orakzai. (Copy of Suspension Order & FIR attached is annexure A & B).
2. Para No. 02 of appeal to the extent of his arrest in the above noted FIR is correct, on account of which he was proceeded against departmentally. He was served with proper charge sheet/ Summary of allegations, during departmental enquiry the allegations against appellant stands proved and recorded by the enquiry, however, departmental and criminal proceedings are two different entities having no bearing on each other. (Copy of Order Sheet/ Summary of allegations and enquiry report Annexure C & D).
3. As already explained in the preceding para, appellant was found guilty during departmental enquiry and after fulfillment of all codal formalities. Appellant was dismissed from service in accordance with rules. (Copy of FIR annexure E).
4. As explained above criminal and departmental proceedings are two different entities having no bearing on each other. Acquittal in criminal cases could not be made bases for reinstatement in departmental proceedings when the allegations against appellant already stand proved in the proper departmental enquiry.
5. Para No. 05 of appeal is correct to the extent of filing of departmental appeal, however the same was rejected being time barred.
6. Para No. 06 of appeal is correct, to the extent of revision petition, however the same was examined and rejected being time barred.
7. Incorrect, the orders of respondents are in accordance with law/ rules therefore, the instant appeal may kindly be dismissed being time barred as well as on the following grounds.

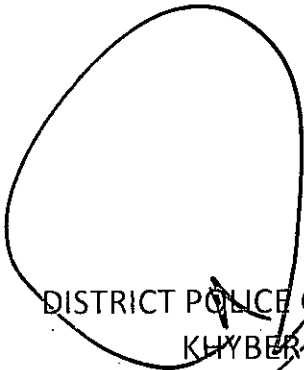
GROUND:

1. Incorrect, appellant was treated according to law/ rules.

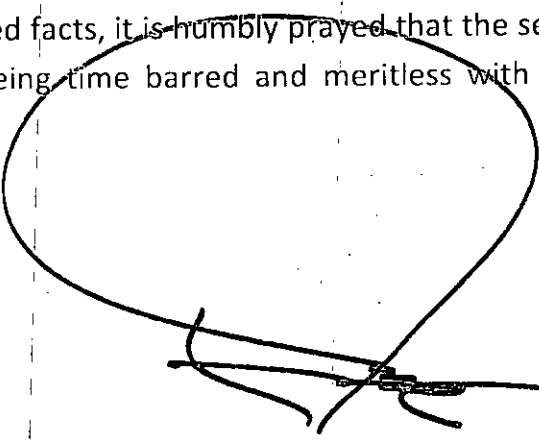
2. Incorrect, as already explained in the preceding paras, appellant was involved in criminal cases, on account of which he was proceeded against departmentally during which he was found guilty and recommended for major punishment. However, it is pertinent to mention that, Criminal proceedings and departmental proceedings are two different entities, having no bearing on each other.
3. Incorrect, as already explained above proper charge sheet and statement of allegation were served to the defaulter official, however he failed to submit any cogent reply in his defense and found guilty during the enquiry.
4. Incorrect as already explained in the above paras.
5. Incorrect, proper opportunity personal hearing was provided before passing final order.
6. That the respondents also seek permission to raise additional grounds at the time of arguments.

PRAYER:-

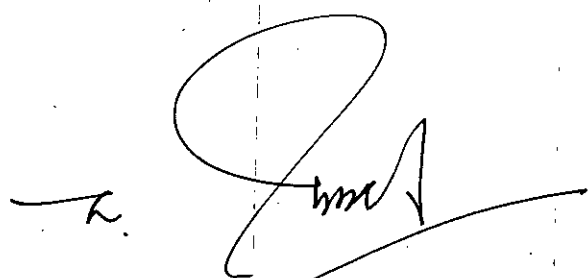
Keeping in view of the above stated facts, it is humbly prayed that the service appeal may very kindly be dismissed being time barred and meritless with costs please.



DISTRICT POLICE OFFICER
KHYBER
Respondent No. 03
(CAPT. ® SALEEM ABBAS KULACHI PSP)
Incumbent



CAPITAL CITY POLICE OFFICER
PESHAWAR
Respondent No.02
(SYEDASHFAQ ANWAR PSP)
Incumbent



DIG/ Legal, CPO
FOR INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR
Respondent No. 01
(DR MUHAMMAD AKHTAR ABBAS PSP)
Incumbent

4

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR.

Service Appeal No. 2462/2023

Muhammad Saeed (Appellant)

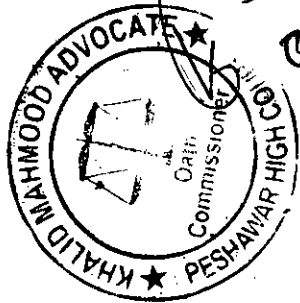
Versus

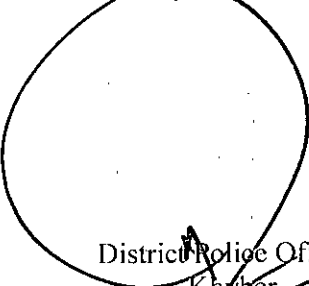
Inspector General of Police Khyber Pakhtunkhwa and others..... (Respondents)

AFFIDAVIT

I, Capt @ Saleem Abbas Kulachi, District Police Officer, Khyber (Respondent No.03) do hereby solemnly affirm on oath that the contents of accompanying Reply to the instant Service Appeal are correct to the best of my knowledge and belief. Nothing has been concealed from this Hon'ble Tribunal.

It is further stated on oath that in this Service Appeal, the answering respondents have neither been placed ex-parte nor their defense is struck off ^{est.}




District Police Officer,
Khyber
Respondent-No. 3
(Capt @SALEEM ABBAS KULACHI, PSP)
Incumbent

3

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR.

Service Appeal No. 2462/2023

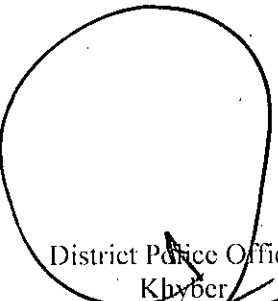
Muhammad Saced (Appellant)

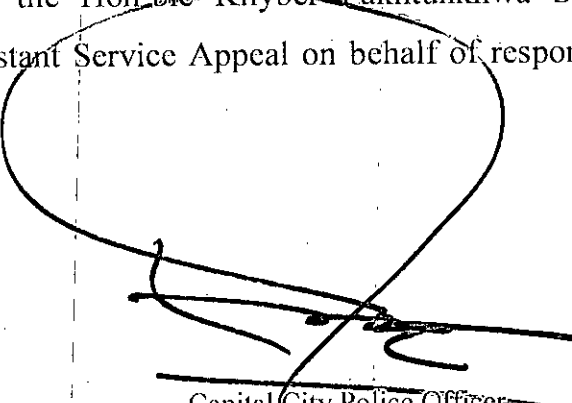
Versus

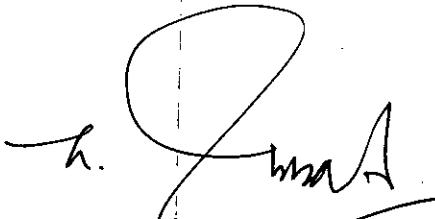
Inspector General of Police Khyber Pakhtunkhwa and others..... (Respondents)

AUTHORITY LETTER

Mr. Mazhar Khan DSP, Khyber is authorized to submit Para-wise comments/
reply in the instant Service Appeal in the Hon'ble Khyber Pakhtunkhwa Service
Tribunal, Peshawar and also to defend instant Service Appeal on behalf of respondents
No. 1 to 3.

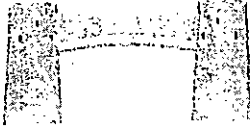

District Police Officer,
Khyber
Respondent No. 3
(Capt @SALEEM ABBAS KULACHI, PSP)
Incumbent


Capital/City Police Officer,
Peshawar
(Respondent No. 2)
(SYED ASHFAQ ANWAR, PSP)
Incumbent


DIG/ Legal, CPO
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
Respondent No. 1
(DR. MUHAMMAD AKHTAR ABBAS, PSP)
Incumbent

6

Annex A



OFFICE OF THE
DISTRICT POLICE OFFICER
KHYBER



No. 584 /PA-DPO Khyber

Dated 21/03/2022

ORDER

FC Muhammad Saeed No. 2811 s/o Sayed Ahmad of District Police Khyber is hereby suspended and closed to Police Lines Khyber, with immediate effect, due to his involvement in FIR No. 09, dated 07/03/2022 of Police Station Central Mishti Mela, District Orakzai.

Separate Chargesheet and Statement of Allegations shall follow.

IMRANKHAN (PSP)
DISTRICT POLICE OFFICER,
KHYBER

OB NO: 378

Date : 21/03/2022

No. 585-89/PA, DPO Khyber

Copies to:

1. DSP HQrs
2. OHC DPO office Khyber
3. Accountant
4. Service Record Branch

Attested by
DSP Khyber
[Signature]

NIC = 21201-6156153-3
MOB = 0304-9738457

کوئٹہ پولیس چیمبر نمبر 13/228846 نمبر صدر ایف ڈی ایف (120.08.2011) (2008) نمبر (2008) نمبر (2008)

پیس پیور نمبر 23

فارم نمبر 23-05

ابتدائی اطلاعی رپورٹ

نقل

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زید دفعہ 152 مجموعہ ضابطہ فوجداری

منزل سستی حملہ	ضلع اورکنزی
59	تاریخ وقوع 14/02/23 وقت 14:50 بج
ارخ وقت رپورٹ 14/02/23 وقت 14:30 بج	جاکیرگی نمبر 14/02/23 وقت 14:50 بج
م دکنوت اطلاع دہندہ مستغیث 0335 9333900	شمارہ لائسنس خان SHO
نفر کیفیت جرم (معدودہ) حال اگر کچھ پایا گیا ہو۔	ISAA
لئے وقوعہ فاصلہ تقائست اورست جنرل روڈ سستی حملہ ٹانگھوہ	نزد ہڈانے اڈہ بفاصلہ 2/3 کلومیٹر جانب شمال ازخانہ
م دکنوت ملزم مشہور خان ولد سید ہلال قوم سلوہ	شمارہ ضابطہ ضلع جنرل
روائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کر دے	پیرا سہرگی واسطہ پر دیا جاتا ہے
اندسے روائی کی تاریخ وقت	پہ سبیل ڈاک

ابتدائی اطلاع نے درج کرو۔ اس وقت ایک تحریری مراسلہ مہیا بنا کر پیرا سہرگی
SHO بدست کنسٹیبل عبد السنف خان 197 قوسوں پر درج ذیل ہے۔ مقرر حکام اہر وس منج
کنسٹیبلان عبد السنف خان 197، نمبر 252 باوردی مہلیخ، بقوت مہنامہ جانے وقوعہ بالا نامی نمبر
پر موجود مقید۔ کم ایسی دوران جانب مہنامہ سے ایک شخص بیرون اڈا ہوا ایک سٹی بنا
پر کھنڈا کر کے جامع تلاش لینے پیرا سہرگی کے ہڈا سٹواری سے ایک نفر ب لستوں 30 پورا
بلا پتہ مع فیکٹس چار جرم معمول 04 عدد کا نوٹس 30 پور پیرا سہرگی کے کو پور موقع پیرا
با پارسل پرا میں کر کے پارسل کے اندر 3 عدد نمونہ مہر استہما MY نمبر کر کے حکم پارسل
کے پیرا سہرگی سطح پر 3 عدد واپس استہما MY نسبت کر کے پتوں فرد مقصد پور سٹی میں کی گئی
شخص ظفر نے وقوعہ پر بابت پتوں کوئی قسم کے لائنیں، فرسٹ پتہ پتہ کر کے
دریافت پیرا سہرگی کوہ نے اپنا نام مشہور خان ولد سید ہلال قوم سلوہ نمبر ضلع فریاج
ضلع تٹلا کر کے پور سٹی جرم بالا کا پارسل حسب ضابطہ گرفتاری کا کارڈ گرفتاری علامتہ
جاری کی گئی۔ کارڈ گرفتاری، فرد مقصد، حراست، پتہ پتہ قابلہ مقدم بدست کنسٹیبل
عبد السنف خان 197 ارسال خانہ ہے۔ پیرا سہرگی دیا جانے میں مصروف تفتیش میں دستخط
انگریزی نمبر لائسنس SHO مورخہ 14.02.23 شماره اولیہ 14-02-23
درج بالا ہو کر پیرا سہرگی بالا جا کر کر کے نقل FIR مع دیگر کاغذات اجراء تفتیش
فرام 197 کنسٹیبل پیرا سہرگی کو بھیجا جاتا ہے۔ پیرا سہرگی

MHC PS mm
14-02-23

Attended by SSP Myjber

8

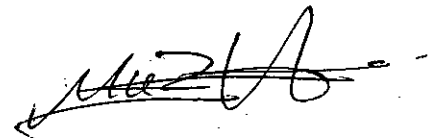
Annex C

CHARGE SHEET UNDER SECTION 6(i(a)) OF POLICE (E&D) RULES 1975

1. I, Imran Khan, PSP, District Police Officer, Khyber, as a competent authority, hereby charge FC Muhammad Saeed No. 2811 as per Statement of Allegations enclosed.
2. By the above-mentioned reasons, you appear to be guilty of Misconduct as per Police (E&D) Rules, 1975 and that you have rendered yourself liable to all or any of the penalties specified in Police (E&D) Rules, 1975.
3. Therefore, you are directed to submit your written defense within 07 days of the receipt of this Charge Sheet to the Inquiry Officer, as the case may be.
4. Your written defense, if any, should reach the Inquiry Officer within the specified period, failing to which it shall be presumed that you have no defense to put in and, in that case, *ex-parte* action shall follow against you.
5. State, whether you desire to be heard in person or not.

IMRAN KHAN (PSP)
DISTRICT POLICE OFFICER,
KHYBER

Accepted by
DPO Khyber



9

Dated: 11/03/2022

No. 890/PA-DP/Khyber

**DISCIPLINARY ACTION UNDER SECTION 5(3) OF POLICE (E&D) RULES
1975**

I, Imran Khan, PSP, District Police Officer, Khyber, as a competent authority, believe that FC Muhammad Saeed No. 2811 s/o Sayed Ahmad has rendered himself liable to be proceeded against as he committed the following acts/omissions within the meaning of Police (E&D) Rules, 1975 (With Amendments – 2014).

STATEMENT OF ALLEGATIONS UNDER SECTION 6 (i(a)) OF POLICE RULES 1975

Whereas FC Muhammad Saeed No. 2811 s/o Sayed Ahmad of District Police Khyber is involved in FIR No. 09 u/s 9D-CNSA, 11A-CNSA, dated 07/03/2022 of Police Station Central Mishti Mela, District Orakzai. Further, he was recently bailed-out in FIR No. 01 u/s 392/34 PPC, dated 06/01/2022 of Police Station Tirah, District Khyber, which shows his neglectful attitude towards law. This act comes under the meaning of Misconduct as per section 2(iii) and rendered him liable for punishment under section 3(d) of Khyber Pakhtunkhwa Police (E&D) Rules, 1975 (With Amendments – 2014), respectively.

To probe into the above-mentioned allegations against the said accused DSP (Traffic) is hereby nominated as the Inquiry Officer under Section 5(4) of the Khyber Pakhtunkhwa Police (E&D) Rules 1975 (With Amendments – 2014).

The Inquiry Officer shall in accordance with the provision of Police (E&D) Rules, 1975, provide reasonable opportunity of hearing to the delinquent official, record the findings, and make immediate recommendations whether to punish or to take other appropriate action against the delinquent official.

FC Muhammad Saeed No. 2811 is directed to appear before the Inquiry Officer on the date, time and place fixed by the Inquiry Officer.

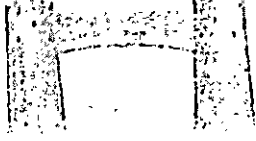
Attested by DSP Khyber

IMRAN KHAN (PSP)
DISTRICT POLICE OFFICER,
KHYBER

[Signature]

10

Annex D



OFFICE OF THE
DISTRICT POLICE OFFICER
KHYBER



No. 1694/PA-DPO Khyber

Dated 22/04/2022

To: The Superintendent
HQ Sub-Jail
Babur Mela, Hangu

Subject: SERVING AND REPLY OF CHARGESHEET AND STATEMENT OF ALLEGATIONS

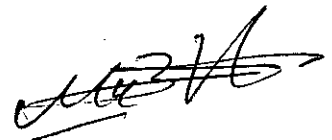
Memo:

Enclosed please find herewith the Chargesheet and Statement of Allegations of FC Muhammad Saeed No. 2811 s/o Sayed Ahmad charged in case FIR No. 09 u/s 9D-CNSA, dated 07/03/2022 of Police Station Central Mishti Mela, District Orakzai, presently under custody in Babur Mela HQ and Sub-Jail Hangu.

It is requested that these documents shall be served to the accused and his written reply shall be sent back to this office within 07 days of the receipt. Please.


For DISTRICT POLICE OFFICER,
KHYBER

6
Attested by DSP Khyber



(11)

Annex (E)

**OFFICE OF THE
DISTRICT POLICE OFFICER
KHYBER**



INQUIRY REPORT

FC Saeed No. 2811

Kindly refer to the inquiry order vide No. 890/PA-DPO Khyber, dated 21/03/2022 to probe into the alleged misconduct by FC Saeed No. 2811 s/o Sayed Ahmad.

The undersigned was assigned as the Inquiry Officer to probe into the matter. FC Muhammad Saeed was found involved in two FIRs in span of two months. First, he was involved in Case FIR No. 01 u/s 392/34 PPC, dated 06/01/2022 of Police Station Tirah. Second, he was involved in Case FIR No. 09 u/s 9D-CNSA, 11A-CNSA, dated 07/03/2022 of Police Station Central Mishti Mela, District Orakzai.

Chargesheet and Statement of Allegations was issued to the defaulter official. As he was under custody in Headquarters Sub-Jail, Babur Mela Hangu, a letter along with Chargesheet and Statement of Allegation was sent to the said prison vide 1694/PA-DPO Khyber dated 22/04/2022 to serve and receive the reply of the defaulter official regarding the allegations. However, the delinquent official failed to submit any cogent reply in his defense. Further, in ground check it is revealed that he was habitual offender.

Conclusion

The defaulter official is involved in multiple cases and is now under custody in Case FIR No. 09 u/s 9D-CNSA, 11A-CNSA dated 07/03/2022. He was issued with chargesheet and statement of allegations, but he failed to submit any satisfactory reply.

Recommendation

The undersigned is satisfied that the defaulter official is habitual offender. Thus, it is kindly recommended that the official shall be awarded with Major Punishment of Dismissal from Service.

Submitted Please

Approved by DSP Khyber

[Signature]
MR. MAZHAR AFRIDI
DSP TRAFFIC AND HIGHWAYS
KHYBER

TRAFFIC BRANCH KHYBER POLICE

PA
OK

[Handwritten mark]

(12)

Aneer (F)

پولیس فارم نمبر 24-5-1)

سر میل نمبر: 000116--Peshawar

ابتدائی اطلاعی رپورٹ نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 154 مجموعہ ضابطہ فوجداری

نمبر: 1/22 قاعدہ: تیرا ضلع: خیبر ای ٹیک نمبر: 00001

تاریخ و وقت وقوع: 06-01-2022 08:00 AM تاریخ وقت رپورٹ: 022/01/06 وقت رپورٹ: 13:30

1	تاریخ وقت رپورٹ	بحوالہ رپٹ نمبر (11) 12-01-2022 02:00PM	6	تھانہ سے روانگی کی تاریخ بوقت	بہ سبیل عام
2	نام و سکونت اطلاع دہندہ مستغیث	شناختی کارڈ نمبر: فضل رحمن ولد اقبال شاہ، پتہ: کوکی خیل گودر جرود، 7-9020368-21202 فون نمبر: 03023000794		درخواست مرتبہ مرسلہ:	
3	مختصر کیفیت جرم (معدہ دفعہ) و مال اگر کچھ کھو گیا ہے	بجرم: 34 ت پ 392 ت پ 412 ت پ			
4	جائے وقوعہ و فاصلہ تھانہ سے اور سمت	میں روڈ شلور قبر خیل نزد میاں گانوں مشین جانب جنوب بفاصلہ از تھانہ 3 کلومیٹر			
5	کارروائی متعلقہ تفتیش اگر اطلاع درج کرنے میں کچھ توقف ہوا ہو تو اس کی وجہ بیان کی جاوے	بعد انکوائری مقدمہ درج رجسٹر کیا جاتا ہے۔			

Affected by explosion

[Signature]

دستخط: MINA GUL بیلک نمبر: 155 عہدہ: HC ٹیلی فون نمبر: 03331900095

(ابتدائی اطلاع نیچے درج کریں)

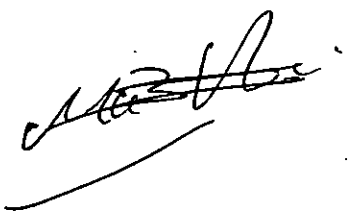
بحوالہ مد 9 روزنامہ 06/01/2022 مدعی مقدمہ بالا برخلاف ملزمان بالا تحریری درخواست پیش کر کے رپورٹ کی تھی جو بعد انکوائری معلوم ہوا کہ وقوعہ سرزد ہو چکا ہے تحریری درخواست پر مدعی نے بالا کسان کے برخلاف دعویٰ اداری کی ہے مضمون درخواست مدعی سے صورت جرم بالا کا پائی جا کر پرچہ بجرم بالا برخلاف ملزمان بالا درج رجسٹر کر کے نقول پرچہ جات بعرض تفتیش حوالہ احسان اللہ خان IO کئے جاتے ہیں پرچہ گزارش ہے مینا گل 12/01/2022 SI نقل مذ ذیل ہے مد 9 رپورٹ ایران گل ASHO وقت 13:30 بجے روزنامہ 06/01/2022 اس وقت مسی فضل رحمن ولد اقبال شاہ قوم کوکی خیل تپہ نیل ساکن گودر جرود نیو آبادی بحاضری تھانہ آکر ایک تحریری درخواست پیش کی جو بمضمون ذیل ہے بخدمت جناب SHO صاحب تھانہ تیراہ جناب عالی گزارش ہے کہ میں مسی فضل رحمن ولد اقبال شاہ ساکن کوکی خیل نیل ساکن گودر جرود ضلع خیبر کارہائشی ہوں پیشہ کے لحاظ سے اپنے لئے سوزو کی پک اپ نمبری JA7324 ماڈل 2019 برنگ سفید خرید کر بطور لوڈنگ و ٹیکسی چلاتا ہوں مورخہ 03/01/2022 کو بطور ٹیکسی یومیہ 2000 روپے مسی محمد سعید ولد سید احمد سکنہ شلور بر قبر خیل پیش ہو کر مسی محمد سعید اور اس کا سہیلی جمیل ولد خان وزیر ساکن شلور بر قبر خیل حال باڑہ کیساتھ بطرف تیراہ روانہ ہو کر تیراہ کو بوقت 18:45 بجے رات کو پہنچ کر میں نے مسی محمد سعید کو کرایہ دینے کو کہہ کر اس بات پر بالا دونوں کسان غصے میں ہو کر میرے ساتھ ہاتھ پائی شروع کر کے ہر دو بالا کسان نے مجھ سے میرے گاڑی کی چابی اور رجسٹریشن بزور چھین لیا اور میرا سوزو کی پک اپ متذکرہ بالا اشارت کر کے لے گئے میں بالا کسان کے برخلاف کرایہ نہ دینے اور سوزو کی پک اپ بمعہ رجسٹریشن بزور چھین کر لے جانے کا دعویٰ ہوں دستخط نشان انگوٹھا فضل رحمن ولد اقبال شاہ سکنہ کوکی خیل نیل ساکن گودر جرود ضلع خیبر شناختی کارڈ نمبر 2120290203687 موبائل 03023000794 کارروائی تھانہ پیش کردہ تحریری درخواست حرف بحرف درج بالا ہو کر معاملہ چھان بین کا محتاج ہے نکلند علیحدہ مرتب ہو کر بعرض انکوائری و کارروائی بیٹ مینا گل خان SI بجھوایا جاتا ہے بعد انکوائری جیسی بھی صورت پائی گئی کارروائی حسب ضابطہ عمل میں لائی جائیگی جناب عالی نقل برطابق اصل ہے۔

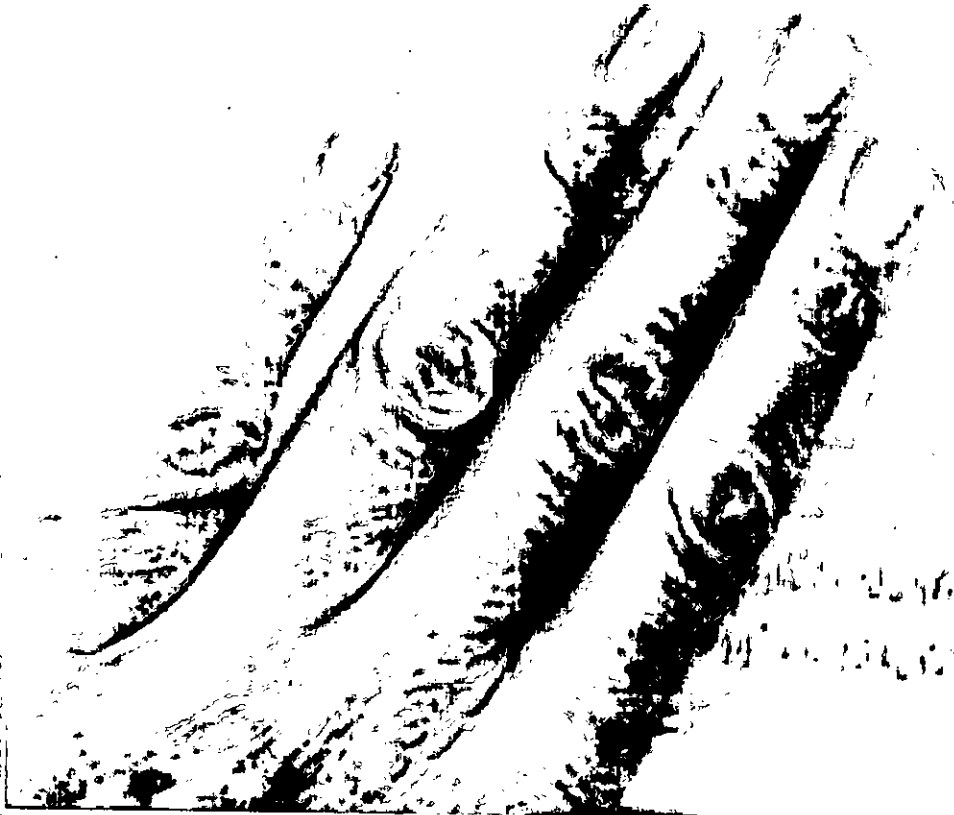
١٤٩
کاملاً تکرار شد۔ - فضا باطل۔ - قریباً ۱۰۰۰ سال۔ - عمارت کی تباہی۔ -
بہت سے لوگوں کی موت۔ - اللہ تعالیٰ کی عبادت۔ - دعا کی تکرار۔ -
اللہ تعالیٰ سے دعا ہے کہ یہ سب باتیں سچ ہوں۔

61-PS-Timh
11-01-2001

اللہ تعالیٰ سے دعا ہے کہ یہ سب باتیں سچ ہوں۔
اللہ تعالیٰ سے دعا ہے کہ یہ سب باتیں سچ ہوں۔
اللہ تعالیٰ سے دعا ہے کہ یہ سب باتیں سچ ہوں۔

Attested by
BSP Wazir





15

Annex G

OFFICE OF THE
DISTRICT POLICE OFFICER
KHYBER



No. 2709 /PA-DPO Khyber

Dated 03/06/2022

DISMISSAL ORDER

FC Muhammad Saeed No. 2811 s/o Sayed Ahmad was suspended vide Order No. 884 – 89/PA-DPO Khyber dated 21/03/2022 due to his involvement in Case FIR No. 09 u/s 9D-CNSA, 11A-CNSA dated 07/03/2022 of Police Station Central Mishti Mela, District Orakzai.

An Inquiry was initiated against him vide Order No. 890/PA-DPO Khyber dated 21/03/2022 to probe into the matter. Chargesheet and Statement of Allegations were issued against the defaulter official. However, in the above-mentioned Case FIR, the defaulter was already under custody in Headquarters Sub Jail, Babur Mela, Hangu. Thus, vide Letter No. 1694/PA-DPO Khyber dated 22/04/2022, chargesheet and statement of allegations were served to the defaulter official. However, he failed to submit any cogent reply in his defense.

Further, a ground check was performed against the defaulter official. It was found that he was already nominated in another Case FIR No. 01 u/s 392/34 PPC, dated 06/01/2022 of Police Station Tirah, District Khyber. And later nominated in above-mentioned Case FIR. Further it was revealed that he was a habitual offender and had many complaints against him. Thus, Inquiry Officer recommended the Major Punishment of Dismissal as per rule.

Keeping in view of the above recommendation and in order to maintain regimental norms and discipline in the force, the undersigned is satisfied that the defaulter official shall be awarded with Major Punishment of Dismissal as per Section 4-b(iv) of Police (E&D) Rules 1975 (With Amendments – 2014).


IMRAN KHAN (PSP)
DISTRICT POLICE OFFICER,
KHYBER

No. 2709-16 /PA. DPO Khyber

Copies to:

1. DSP HQs/RJ Lines, DPO Khyber
2. OIC, DPO Khyber for Record
3. Accountant, DPO Khyber to stop his salaries
4. Service Record Branch, DPO Khyber for Service Book Record

Attended by ASP (Legal) 