BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1130/2019

Date of Institution

05.09.2019

Date of Decision

14.09.2021

Jasim Khan S/o Shah Afzal 552 (Ex-Police Constable Kohat)

(Appellant)

VERSUS

Inspector General of Khyber Pakhtunkhwa Police Peshawar and two others.

(Respondents)

SYED MUDASIR PIRZADA

Advocate

For Appellant

ASIF MASOOD ALI SHAH,

Deputy District Attorney

For Respondents

SALAH-UD-DIN ATIQ-UR-REHMAN WAZIR

MEMBER (JUDICIAL)
MEMBER (EXECUTIVE)

JUDGMENT

ATIQ-UR-REHMAN WAZIR MEMBER (E):- Brief facts of the case are that the appellant while serving as constable in Kohat Police, was proceeded against on the charges of his involvement in narcotics business and was ultimately dismissed from service vide impugned order dated 20-06-2019. Feeling aggrieved, the appellant filed departmental appeal dated 29-06-2019, which was rejected vide impugned order dated 17-08-2019, hence the instant service appeal instituted on 05-09-2019 with prayers that the impugned orders may be set aside and the appellant may be re-instated in service with all back benefits.

02. Learned counsel for the appellant has contended that the appellant has not been treated in accordance with law hence his rights secured and guaranteed

\$ 30 F

under the law were badly violated; that proceedings against the appellant were initiated under general police rules, but when the charges were not proved, the competent authority dispensed with the general proceedings and awarded major punishment of dismissal from service under summery proceedings, which is illegal and contrary to the norms of natural justice; that no final showcause notice was served upon the appellant and termination order was issued on the basis of charge sheet, which too is illegal; that the charges leveled against the appellant were regarding his involvement in narcotics business, which was not proved against him during the inquiry, rather the inquiry officer exonerated the appellant of such charges; that when the charges were not proved, the competent authority penalized the appellant on his previous record, which was a closed transaction and penalizing a civil servant on previous defaults is illegal; that neither any witnesses were produced nor their statement recorded to establish the charges leveled against the appellant; that while imposing major penalty, the principle of natural justice required that a regular inquiry was to be conducted in the matter and opportunity of defense and personal hearing was to be provided to the civil servant proceeded against, otherwise civil servant would be condemned unheard and major penalty of dismissal from service would be imposed upon him without adopting the required mandatory procedure, resulting in manifest injustice. Reliance was placed on 2008 SCMR 1369; that the appellant was never associated with the so-called inquiry proceedings and where the civil servant is not associated with inquiry proceedings nor is he afforded opportunity to cross-examine witnesses produced against him, inquiry proceedings and consequential order regarding his dismissal suffered from inherent legal defects. Reliance was placed on 1997 SCMR 1073; that the charges so leveled are factual in essence, which cannot be proved without conducting proper inquiry, but the respondents malafiedly and without adopting proper legal procedure penalized the appellant in an arbitrary manner, which is illegal, unlawful and is liable to be set at naught.



04.

- Learned Deputy District Attorney appearing on behalf of respondents has 03. contended that it was confirmed through reliable sources by respondent No 3 that the appellant is involved in narcotics business, on the basis of which disciplinary proceedings were initiated against him and he was rightly penalized for the charges leveled against him; that proper inquiry was conducted against the appellant and charge sheet/statement of allegations were served upon the appellant, to which he responded; that as per police rules, issuance of showcause notice is not mandatory; that there were enough material on record to ascertain that the appellant as well as his father were involved in narcotics business.
- We have heard learned counsel for the parties and have perused the record. Record reveals that proceedings against the appellant were initiated under general proceedings and to this effect; charge sheet/statement of allegations were served upon the appellant with the allegations of indulgence of the appellant as well as his father in narcotics business. Simultaneously, ASP Sadder, Kohat was appointed as inquiry officer, who exonerated him of such charges. The competent authority after perusal of the inquiry report changed his mind and dispensed with the general proceedings under section-5(2) of police rules, 1975 and imposed major penalty of dismissal upon the appellant, which however was unlawful for the reason that only one of the minor penalty mentioned in Police Rules, can be awarded in pursuance of the rules ibid and this single illegality is enough for setting aside the impugned orders, but in order to sensitize the respondents, it would be beneficial to point out other irregularities as well. We have noted that the appellant was penalized for the charges, which were quashed by the inquiry officer and were not established against the appellant, but even then he was dismissed by leveling the same charges, which is unlawful and contrary to the norms of natural justice. It however is a well-settled legal proposition that regular inquiry is must before imposition of major penalty of dismissal from service. Reliance is placed on 2009 PLC (CS) 650. The Supreme Court of Pakistan in another judgment reported as 2008 SCMR 1369 has held that in case

of imposing major penalty, the principles of natural justice required that a regular inquiry was to be conducted in the matter and opportunity of defense and personal hearing was to be provided to the civil servant proceeded against, otherwise civil servant would be condemned unheard and major penalty of dismissal from service would be imposed upon him without adopting the required mandatory procedure, resulting in manifest justice. Obviously the appellant was not associated with the process of disciplinary proceedings and was condemned unheard.

05. In view of the foregoing discussion, the instant appeal is accepted. The impugned orders dated 20-06-2019 and 17-08-2019 stands set aside and the appellant is re-instated in service with all back benefits. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED 14.09.2021

(SALAH-UD-DIN) MEMBER (JUDICIAL) (ATIQ-UR-REHMAN WAZIR) MEMBER (EXECUTIVE) ORDER 14.09.2021

Syed Mudasir Pirzada, Advocate, for the appellant present.

Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the instant appeal is accepted. The impugned orders dated 20-06-2019 and 17-08-2019 stands set aside and the appellant is re-instated in service with all back benefits. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED 14.09.2021

> (SALAH-UD-DIN) MEMBER (JUDICIAL)

2000年8月15日

(ATIQ-UR-REHMAN WAZIR) MEMBER (EXECUTIVE)



25.05.2021

None for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Today's date was posted on Note Reader, therefore, notice for prosecution of the appeal be issued to appellant as well as his counsel and to come up for hearing before D.B on 14.09.2021. Member copy of the instant appeal is also not available, therefore, appellant is directed to provide the same on or before the next date of hearing.

(MIAN MUHAMMAD) MEMBER (EXECUTIVE) (SALAH-UD-DIN) MEMBER (JUDICIAL) 09.09.2020

Appellant is not present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is present.

Perusal of record also reveals that Member copy of the requisite record has not been placed on record, appellant as well as his counsel are directed to make up deficiency of record well before next date.

The bench was informed that the learned counsel representing the appellant namely, Syed Mudasir Pirzada, Advocate, is not available in Peshawar and his clerk who attended the court requested for adjournment. Adjourned for 26.11.2020 for arguments.

(Mian Muhammad) Member (Executive) (Muhammad Jamal Khan) Member (Judicial)

26.11.2020

Mr. Yasir Saleem Advocate for Muddassir Pirzada, Advocate for appellant and Zara Tajwar, DDA alongwith Arif Saleem, Steno for the respondents present.

Requests for adjournment as learned counsel for the appellant could not reach from Kohat due to indisposition. Adjourned to 18.02.2021 for hearing before the D.B.

(Mian Muhammad) Member(E) Chairman

Due to pandemie of Covid, 19 the case is adjournal to 25-05.2021

28.01.2020 Clerk to counsel for the appellant present. Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith ARif Salim Stenographer present and submitted written reply/comments. Adjourn. To come up for rejoinder if any and arguments on 31.03.2020 before D.B

-∖ Member

31.03.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 22.06.2020 before D.B.

22.06.2020

Due to public holiday on account of COVID-19 the case is adjourned for the same on 09.09.2020 before D.B.

18.10.2019 Counsel for the appellant present.

Contends that in the statement of allegations the appellant was connected to have indulged in the narcotics smuggling. Besides, his father was also tagged to have been involved in the business of narcotics. On the other hand, in the impugned order date 20.06.2019 twelve bad entries in service record of appellant as well as supporting the drug paddlers was also made grounds for imposition of major penalty of dismissal from service against him. It is the contention of learned counsel that the appellant could not be held responsible for the actallegedly committed by his father. Further, that the allegations were of required thorough probe which nature regular/proper enquiry, however, the same was dispensed with and the appellant was penalized after conducting summary proceedings. It is well settled that in the departmental proceedings culminating into major penalty regular enquiry is all the more necessitated.

In view of available record and arguments of learned counsel, instant appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for submission of written reply/comments on 16.12.2019 before S.B.

Chairman

16.12.2019

Appellant Devisited Security & Pilocess Fee

Counsel for the appellant and Addl. AG alongwith Arif Saleem, Steno for the respondents present.

Representative of the respondents requests for time to furnish the requisite reply/comments. Adjourned to 28.01.2020 on which date reply/comments shall positively be submitted.

Chairman

Form- A

FORM OF ORDER SHEET

Court of	· · · · · · · · · · · · · · · · · · ·	
Case No	1130/ 2019	

	Case No	<u>1130/2019</u>
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/09/2019	The appeal of Mr. Jasim Khan presented today by Uzma Syed Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.
2-	06/09/19.	This case is entrusted to S. Bench for preliminary hearing to be put up there on 18 10 19.
- 		CHAIRMAN
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BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

•Service Appeal 1130 / 2019

Jasim Khan S/o Shah Afzal 552 (Ex-Police Constable Kohat)

(Appellant)

Versus

- 1. INSPECTOR GENERAL OF KPK POLICE PESHAWAR.
- 2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
- 3. DISTRICT POLICE OFFICER KOHAT.

(Respondents)

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4.	Copy of Charge Sheet & Summary of Allegation, enquiry finding report along with reply	Α	8-11
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6.	Copy of Departmental representation dated 29-06-2019 along with rejection order dated:17-08-2019	<i>Q p</i> 5 0	13-19
7.	WakalatNama		:

Dated: 5 - 9 / 2019

Through

Appellant

Syed Mudasir Pirzada

Advocate PHC

Cell 0345-9645854

Uzma Syed

Advocate HC Peshawar

<u>_</u> 1 Ļ 21-91

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal _____/ 2019.

Jasim Khan S/o Shah Afzal 552 (Ex-Police Constable Kohat)

(Appellant')

Kshyber Pakhtukhwa

Service Tribunal

Diary No. 12"

05/91

Versus

1. INSPECTOR-GENERAL OF KPK POLICE PESHAWAR.

2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT

DISTRICT POLICE OFFICER KOHAT.

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE MPUGNED ORDER DATED 20-06-2019 O.B No 20-06-2019 IN WHICH THE RESPONDENT NO:-3 DISMISSED THE SERVICE OF APPELLANT WITH IMMEDIATE EFFECT WITHOUT ANY LEGAL JUSTIFICATION APPELLANT FEELING AGRRIVED FILE DEPARTMENTAL REPRESENTATION DATED 29-06-2019 WHICH WAS NOT ENTERTAIN AND THE SAME WAS REJECTED ON DATED 07-08-2019

Pray:

It is respectfully prayed that on acceptance of instant service appeal the Hon bale Tribunal may direct to respondents above to set a side illegal impugned order dated 20-06-2019 and the Appellant may graciously be re-instated in service with all back benefits and blessed with any other remedy in the larger interest of Justice.

Respectfully Sheweth,

With great veneration the instant appeal is preferred by the appellants on the following grounds:-

19 10 FACTS

- 1:- That the brief facts of the appeal are that on the allegation against the appellant was that the appellant is indulged in narcotics smuggling as well as the father of the appellant is involved in the business of narcotics (Copy of Charge Sheet etc is annexed as annexure A)
- 2:- That the appellant was served with the charge sheet and summary of allegation in which the appellant submitted the reply to the said which was not consider and award the major punishment of dismissal from service with immediate effect (Copy of impugned order annexed as Annexure B)

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- 3:-That as per enquiry finding report which was not provided to the appellant and after awarding the major punishment by the respondent No-3 the enquiry report obtain by the appellant in which the enquiry officer admitted and state the fact that there is no evidence nor any record is available which connect the appellant with the allegation.
- 4:-That the appellant feeling aggrieved from the impugned order prefer departmental representation which was not considered and the same was rejected without any lawful justification on dated 17-08-2019. (Copy of departmental representation is annexed as annexure C).
- 5:-That in the absence of the appellant all the departmental impugned proceedings were conducted without the aid of enquiry without issuing the show cause notice, cross examination without awarding the opportunity of personal hearing directly bless with the impugned order.
- 5:-That no show cause notice was issued to the appellant no witness were examine in support of allegation even no evidence is available on record no medical evidence is on record which proves the allegation against the appellant and award the major punishment of dismissal from service
- 6:-That the inquiry officer on the basis of DSB report based his finding report which is not legally correct because the appellant was not granted opportunity to cross examine on the report of DSB and DSB report has not legal value for forming opinion such a unilateral and objectionable report which is not correct.
- 7: That in the charge sheet and statement of allegation it was alleged that appellant is indulged in narcotics smuggling, however the inquiry officer in his finding has held that, that the appellant is not involved in narcotics smuggling and the inquiry officer brushed aside the main allegation against the appellant but respondent No: 3 being a competent authority completely ignoring the findings of the inquiry officer and awarded the major punishment of dismissal from service.

- (W)
- 8. That the main allegation against the appellant was that, that the appellant was indulge in Narcotics smuggling but the respondent No: 03 award the punishment for involvement in drinking of wine and supporting the drug paddlers and both the allegations are quite distinct hence alleging one offence and punishment awarding in another undone offence which is not the subject matter of enquiry which vitiated the entire enquiry proceedings against the appellant.
- 9:-That the appellant has been awarded the major punishment is summary proceedings instead of general proceedings hence as a result of summary proceedings awarding punishment is illegal unlawful and of no legal effect.
- 10.-That the there is nothing on record which show that the appellant has committed any offence nor having any criminal history ,even no single bad entry is available on record.
- 11.-That the Appellant is aggrieved from the impugned order of the respondent No-3 and having no alternate remedy except this Honorable, Court for speedy disposal / redressal for infringement of his rights through present service appeal on the following amongst other grounds.

Grounds

- 1:- That the illegal acts of the respondents No -3 is against to the cannon of law as well as against to the natural justice.
- 2:-That there no legal cogent reason defined by respondent No-3 for which the present Appellant has been dismissed from service.
- 3:-That the impugned order is against to the principal of natural justice and show the bias ness on the part of respondent No-3.
- 4.-That the impugned order of the above respondent is illegal and highly condemnable and unlawful in nature

5:-That the Appellant is a poor and only person to earn the livelihood for his large supported family and the income from his job is a source of spoon feeding for infant children's.

6.-That the bias of the respondent No-2 clearly shows by not entertaining the representation of the appellant, keeping in view the decision of apex court the respondents above were duty bound to record reason of rejection "when departmental appeal was submitted to the competent authority and was duty bound to decide same within reasonable time after application of independent mind, by giving reason such was a requirement of law as well as of the principal of natural justice "2009 (PLC) (CS) 77.

7:- That it is clearly mention in 2003 PLC CS 1468 that any instruction issued in violation of Rules would be illegal and void.

8:- That some other grounds will be agitated at the time of arguments with the permission of this Honorable court.

PRAYER:-

It is respectfully prayed that on acceptance of instant service appeal the Hon bale Tribunal may set a side the impugned order dated 20-06-2019 and the Appellant may graciously be re-instated in service with all back benefits and & blessed with any other remedy in the larger interest of Justice.

Appellant

Through

Syed Mudas (r Pirzada Advocate PHC Cell 0345-9645854

Adyocate HC Peshawar

Uzma Şwed

Certificate:-

Certified that as per instruction received from my client this is the first writ petition on the subject matter ever moved before this Honorable Court.

LIST OF BOOKS

Constitution of Islamic Republic of Pakistan 1973. Any other Book according to need.



BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

•	
Service Appeal	/2019

Jasim Khan S/o Shah Afzal 552 (Ex-Police Constable Kohat)

(Appellant)

Versus

- 1. INSPECTOR GENERAL OF KPK POLICE PESHAWAR.
- 2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
- 3. DISTRICT POLICE OFFICER KOHAT.

AFFIDAVIT

I Mr Jasim S/o Shah Afzal of Kohat do hereby solemnly affirm and declare that the contents of enclosed appeal are true and correct to the best of my knowledge and belief and nothing has been concealed there form

Verification :-

Verified on oath at Kohat that the contents of above affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed there from.

Identified By:

Syed Mudasir Pirzada

Advocate

·. -

Déponent



	Service Appeal	/ 2019.	:
Jasim Khan S/o S	hah Afzal 552 (Ex-Polic	ce Constable Kohat)	
			(Appellant)
	Versus		

- 1. INSPECTOR GENERAL OF KPK POLICE PESHAWAR.
- 2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
- 3. DISTRICT POLICE OFFICER KOHAT.

ADDRESSES OF THE PARTIES

APPEALLANT

Jasim Khan S/o Shah Afzal 552 (Ex-Police Constable Kohat)

RESPONDENTS:-

- 1. INSPECTOR GENERAL OF KPK POLICE PESHAWAR.
- 2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
- 3. DISTRICT POLICE OFFICER KOHAT.

Appellant

Through

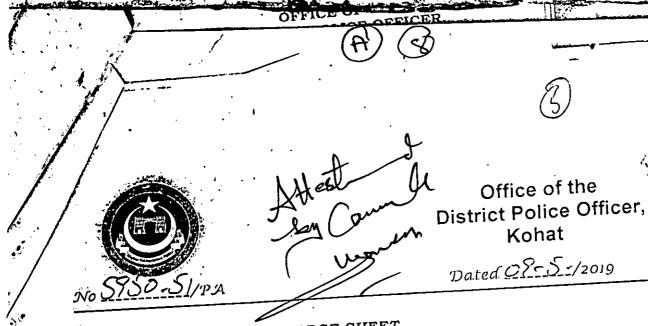
Syed Mudasii Pirzada

Advocate PHC

Uzma Syed

Cell 0345-9645854

Advocate HC Peshawar



CHARGE SHEET.

I, <u>CAPT ® WAHID MEHMOOD</u>, <u>DISTRICT POLICE OFFICER</u>, <u>KOHAT</u>, as competent authority under Khyber Pakhtunkhwa Police Rules (amendments 2014) 1975, am of the opinion that you <u>Constable Jasim No.</u> (stable of the following act/omissions within the meaning of Rule 3 of the Police Rules 1975...

You constable Jasim Khan No. 552 posted at Commissioner squad are indulged in narcotics smuggling as well as your father namely Shah Afzal is also involved in the business of narcotics.

- 2. By reasons of the above, you appear to be guilty of misconduct under Rule 3 of the Rules ibid and have rendered yourself liable to all or any of the penalties specified in the Rule 4 of the Rules ibid.
- 3. You are, therefore, required to submit your written statement within 07days of the receipt of this Charge Sheet to the enquiry

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

A statement of allegation is enclosed.

DISTRICT POLICE OFFICER KOHAT 95

Justin 4

TEGED



Office of the District Police Officer, Kohat

Duted _____/2019

DISCIPLINARY ACTION

CAPT ® WAHID MEHMOOD, DISTRICT POLICE OFFICER, KOHAT as competent authority, am of the opinion that you have rendered yourself liable to be proceeded Constable Jasim No. 552 against departmentally under Khyber Pakhtunkhwa Police Rule 1975 (Amendment 2014) as you have committed the following acts/omissions.



STATEMENT OF ALLEGATIONS

You constable Jasim Khan No. 552 posted at Commissioner squad are indulged in narcotics smuggling as well as your father namely Shah Afzal is also involved in the business of narcotics.

For the purpose of scrutinizing the conduct of said accused with reference to the above allegations ASP Suddar Kohat is appointed as enquiry officer. The enquiry officer shall in accordance with provision of the Police Rule-1975, provide reasonable opportunity of hearing to the accused official, record his findings and make, within twenty five days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused official.

The accused official shall join the proceeding on the

date, time and place fixed by the enquiry officer.

DISTRICT

OLICE OFFICER KOHAT EM 9/0

L/PA, dated 08-5 c /2019.

Copy of above to:-

ASP Saddar Kohat: The Enquiry Officer for initiating proceedings against the accused under the provisions of Police Rule-1975.

The Accused Official:- with the directions to appear before the Enquiry Officer, on the date, time and place fixed by him, for the purpose of enquiry proceedings.



MENTAL INQUIRY AGAINST CONSTABLE JASIM NO. 552

Charge Sheet was issued to Constable Jasim No. 552 vide DPO, Kohat office letter No. 5950-51/PA dated 09.05.2019 and undersigned was appointed Inquiry Officer. Following allegations were levelled against Constable Jasim No. 552:-

"You constable Jasim Khan No. 552 posted at Commissioner Squad are indulged in narcotics smuggling as well as your father namely Shah Afzal is also involved in the business of narcotics.

He submitted his written reply in response to the Charge Sheet and stated that he is neither involved in any illegal activity nor in narcotics smuggling since his induction in police force. He said that its only being done to damage his reputation. However, he admitted that his father is heroin addict and he also remained in rehab to get rid of this. He denied the allegations/leveled against him. He also presented an affidavit in this respect (Attached).

DSB was also approached to get latest information about Constable Jasim No. 552. As per DSB's report, Constable Jasim No. 552 is a drinker. However, there is no news or information about his involvement in Narcotics Smuggling. His father has been charged in Narcotics Cases in the past (Attached).

Findings:-

- > Constable Jasim No. 552 is a drinker and still drinks wine
- regularly. > However, no information / evidence of his involvement in
- Narcotics Smuggling. > His father Shah Afzal is Heroin addict and has been charged in Narcotics Cases in past for his involvement in Narcotics Selling.

Recommendations:-

In the light of the above mentioned findings, undersigned is of the view that Constable Jasim No.552 is not involved in Narcotics Smuggling. However, he drinks wine which is misconduct on his part.

Submitted for appropriate punishment please.

muhammad\nabil khokhar ASP/SDPO SADDAR,

KOHAT



بيان از ال كنشيل جاسم خان نمبر 552 متعينه كمشنر سكوا ذكوها ك

عنوان: محكمانه كارردائي، جارج شيث، خلاصه الزامات

ريغرنس: جناب DPO ساحب كوهائ آفس نمبر 5950-5950 مودند 2019-05-09 برطابق عنوان بالا

جناب عالى!

بحواله متموليقل چارج شيث اورسمري آف اليكيشن معروض خدمت موں كه:

جی پر جوالزام ہے۔ کہ آپ نشیات سمگنگ میں اوٹ بین نہا ہت اوب کے ساتھ مرض ہے۔ کہ مور دے 2009-08-01 سے محکہ پولیس میں بحثیت کنٹیل فرائنس مرانجام دے رہا ہوں۔ تاریخ بحر تی ہے ہے کر آج تک میرے خلاف کوئی محکمانہ کارروائی نہیں ہوئی ہے۔ اگر میں کی خشیات سملنگ میں اوٹ رہا ہوں۔ تاریخ بحر تی خلاف متعاقبہ آفیسر شہادت پیش کرے۔ موجودہ وقت میں جہاں میری تعیناتی ہاں انچاری سے درورٹ کی جائے۔ میرے خلاف جوالزامات میں۔ وہ من سائی شہادت کے زمرے میں ہوسکتے ہیں۔ گاؤں علاقہ میں کچھ ذاتی امور کے سلط میں لوگوں کے ساتھ ہماری نہ گی ہے۔ بدیں وجد میری شہرت کو نقصان پہنچانے کے لیے لوگ میرے خلاف بخیر شوت الزامات لگار ہے۔ ہیں۔ اگر میرے خلاف کوئی چشم دید گواہ د غیرہ ہے تو میرے سامنے لاکر بجھے جرح کا موقع دیا جائے۔ میرے خلاف لگا ہے کے الزامات بیادہ میں۔ اگر میرے خلاف کوئی چشم دید گواہ د غیرہ ہے تو میرے سامنے لاکر بجھے جرح کا موقع دیا جائے۔ میرے خلاف لگا ہے کے الزامات بے بنیادہ میں۔ اگر میرے خلاف کوئی جشم دیں۔

۔ جہاں تک برے والد کا تعلق ہے۔ اس میں کو کی شق نبیں کہ وہ نشات پینے کا عادی ہے۔ ہیروئن پینے کی وجہ سے مذمرف میرے والد کی صحت متاہ ہیں۔ برباد بوئی ہے۔ بلاعلاج معالی محالی محرف میرے والد کی صحت متاہ

سوال یہ پیدا ہوتا ہے کہ میرے والد کو منیات مرہیروئن پنے پرعادی کس نے بنایا۔صاف ظاہرہے کہ ان لوگوں نے بنایا۔ جواس طلاقے میں بدستور منیات از تئم ہیروئن فروخت کررہے ہیں ۔اوران کے خلاف منطقی کارروائی اب تک نہیں ہوئی ہے۔ میں اب بھی والد کا وقا فو قامحدود تخواہ میں علاج کروا تا آر ہا ہوں۔میرے والد جو ہیروئن نوشی کا عادی ہے۔اس کی سرا جھے کیے دی خاری ہے۔ جو قا نو قا خلاف قانون ہے۔اگر اس اصول کر میرے خلاف کا روائی خلاف تا نون فعل میں ملوث ہے۔

آخريين ايك دفعه پر التمس مول كمير ب والد كے علاج معالج ش ميرى مدد كى جائے مير ب خلاف الزام بے بنياد بيں۔

مورفه 2019-05-18

جاسم خان نبر 552 متعینه کمشنر سکواڈ کو هاٹ

8





OFFICE OF THE DISTRICT POLICE OFFICER, конат

Tel: 0922-9260116 Fax 9260125

ORDER

This order is passed on the departmental enquiry (summary) proceedings) against Constable Jasim No. 552 under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

Brief facts of the case are that constable Jasim Khan No. 552 posted at Commissioner squad are indulged in narcotics smuggling as well as his father namely Shah Afzal is also involved in the business of narcotics.

He was served with Charge Sheet & Statement of Allegations, ASP Saddar, Kohat was appointed as enquiry officer to proceed against him departmentally. Enquiry officer submitted his finding report and stated that the defaulter official was given full opportunity for cross examination / defense but he failed and could not produce any satisfactory reply.

The defaulter official was called in O.R on 19.06.2019 and heard in person, but he failed to advance any plausible explanation.

I have gone through record, which is found indifferent. The accused official earned 12 bad entries in his whole service. He was also involved in drinking of wine and supporting the drugs paddlers, hence in this allegations and above misconducts, he is hereby the declared the black mole on the image of Khyber Pakhtunkhwa Police.

Therefore, in exercise of power conferred upon me under section 5 (2) of KP Police Rules (amendment 2014)1975, the general proceedings are dispensed with and a punishment of symmatily dismissal from service is imposed on accused constable Jasim No. 552 with immediate effect.

Anno<u>unced</u>

19.06.2019

DISTRICT POLICE OFFICER, KOHAT 20/6

OB No. 769

/PA dated Kohat the 20 -6. 2019.

Copy of above to the:-

R.I Police Lines is hereby directed to collect kit etc from accused official and report.

Reader/SRC/OHC/Pay Officer for necessary action.

$\bigcirc \qquad \bigcirc \qquad \bigcirc \qquad \bigcirc \qquad \bigcirc$

THE DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT

APPEAL UNDER RULE 11 OF THE POLICE RULES

1975 (AMENDED 2014) AGAINST THE IMPUGNED

ORDER OF THE DISTRICT POLICE OFFICER KOHAT

DATED 20-6-2019 VIDE WHICH THE APPELLANT

WAS DISMISSED FROM SERVICE WITHOUT ANY

LEGAL JUSTIFICATION.

Respected Sir;

With grate respect the appellant may be allowed to submit the following for your kind and sympathetic consideration:-

FACTS:

- That the appellant was enrolled as constable in the year
 2009.
- 2. That the appellant after qualifying basic courses successfully from time to time was assigned a number of duties which he performed with honesty and dedication.
- 3. That the appellant since his enrollment has served different police stations and police lines of the kohat District but no officer has ever made any complaint against the appellant.





- 4. That due to the selfless and honest services rendered by the appellant, his senior officers had always reposted their confidence in the appellant.
- That the appellant has never shattered confidence of his seniors during his service.
- 6. That almost rendering service for more or less ten years in the police deptt: it was suddenly revealed upon the police deptt: that the appellant is indulged in narcotics smuggling and that father of the appellant is also involved in the business of narcotics.
- 7. That regarding the said allegations charge sheet and statement of allegations were served upon the appellant while ASP Saddar Kohat was appointed an enquiry officer.
- 8. That inspite of the facts that the enquiry officer vide his findings held that the appellant was not involved in the narcotics smugglings, the Worthy DPO Kohat vide his order dated 20-6-2019 without any reason / justification dismissed the appellant from service.
- 9. That the impugned order has aggrieved the appellant; therefore, following are some of the grounds of appeal:-





GROUNDS:

- a. That the impugned order of punishment is not in accordance with law, facts and evidence on record.
- b. That the order and as well as enquiry are very strange and deviated from law and rules.
- c. That from record it reflects that on one hand police general proceedings have been adopted while at the end of the order police summary proceedings were opted but no reason was furnished that on which ground summary proceedings were preferred.
- d. That it appears that at the initial stage police general proceedings were initiated against the appellant but even in this case too, no evidence was recorded nor the appellant was afforded opportunity to defend himself.
- e. That the enquiry officer on the DSB report has based his findings which is not legally correct because on the said report the appellant was not given opportunity to cross examine the author of the report. Thus legally speaking the DSB report has got no legal value and forming opinion on such a unilateral and objectionable report is not legally correct.
- f. That in the charge sheet and the statement of allegation, it was alleged that the appellant is indulged in narcotics





smuggling however, the enquiry officer in his findings has held that the appellant is not involved in the narcotics smuggling. Hence the enquiry officer brushed aside the main allegation against the appellant but DPO Kohat (Competent Authority) by completely ignoring findings of the enquiry officer had awarded major punishment of dismissal from service.

- g. That allegation against the appellant is that he is indulged in narcotics smuggling but the competent authority awarded him punishment of dismissal for involvement in dinking of wine and supporting the drugs paddlers. Both the allegations are quite distinct hence alleging one offence and according punishment in another offence not subject matter of enquiry the competent authority has fell into a material legal error and thus has vitiated the entire enquiry proceedings against the appellant.
- h. That the competent authority by dispensing the general proceedings has awarded punishment of dismissal from service in summary proceedings. However, perusal of the summary proceedings envisaged in Ruled 5 Sub-rule 2 of the Police Rules 1975 (Amended 2014) it will reveal that the competent authority while exercising the summary proceedings options cannot award major punishment. Hence as a result of summary proceedings awarding major punishment is illegal, unlawful and of no legal effect, hence the punishment orders deserves to be set aside.



- i. That the appellant has never been provided opportunity to defend himself.
- j. That fair trial / enquiry is the fundamental right of the appellant. The enquiry was conducted one sidedly and unllaterally hence it has not fulfilled the ends of justice and the punishment order deserves to be set aside.
- k. That father of the appellant is narcotics addict and the appellant out of his meager salary used to spend on his treatment. Now the appellant after dismissal from service is unable to spend on the treatment of his father. It is likely that his health and mental condition of his father may deteriorate during the time to come.
- That the appellant has never used narcotics in his life nor has dealt with this ugly business.
- m. That the appellant is mindful of the fact that being member of the law enforcing agency, he is duty bound to prevent smuggling, transportation and use of the narcotics and other contraband items. The appellant being a law abiding citizen has never indulged in such objectionable and unethical activities.
- n. That the impugned punishment is the result of some misunderstanding. In the village of appellant opponents of the appellant have spread rumour that the appellant is dealing and using narcotics. The police deptt: by acting on





such rumours has awarded major punishment of dismissal from service which is neither legal nor justified.

- o. That the appellant looks after a large family and he belongs to a poor family. If the punishment of dismissal remains in tact it is likely that family and kids of the appellant will be forced to starvation for the no fault on their part or the appellant.
- p. That if deemed proper the appellant may also be heard in person.

<u>PRAYER</u>

In view of the above legal and factual facts, the impugned order of dismissal from service dated 20-6-2019 is illegal unjustified, based on surmises and conjectures, not fulfilling the ends of justice may be set aside in he great interest of law and justice and the appellant may be reinstated in service with all back benefits. The appellant will be highly obliged for this act of kindness and will pray for your long life and prosperity.

Dated: 29-6-2019.

Yours Obediently,

JASIM KHAN

Ex-constable No.552

POLICE DEPTT:

KOHAT REGION

ORDER.

This order will dispose of a departmental appeal, moved by Ex-Constable Jasim No. 552 of Operation Kohat against the punishment order, passed by DPO Kohat vide OB No. 714, dated 20.06.2019 whereby he was awarded major punishment of dismissal from service on the allegations of his involvement in narcotics smuggling.

He preferred an appeal to the undersigned, upon which comments were obtained from DPO Kohat and his service record was perused. He was also heard in person in Orderly Room, held in this office on 07.08.2019. During hearing, the appellant did not advance any plausible explanation in his defense.

I have gone through the available record and came to the conclusion that the allegations leveled against the appellant are proved and the same has also been established by the E.O in his findings. Therefore, his appeal being devoid of merits is hereby rejected.

Order Announced 07.08.2019

(TAYYAB HAFEEZ) PSP

Region Police Officer, Kohat Region.

No. 7326 /EC

dated Kohat the

/2010

Copy for information and necessary action to the DPO Kohat w/r to his office Memo: No. 12566/LB, dated 11.07.2019. His service roll and Fauji missal/enquiry file is returned herewith.

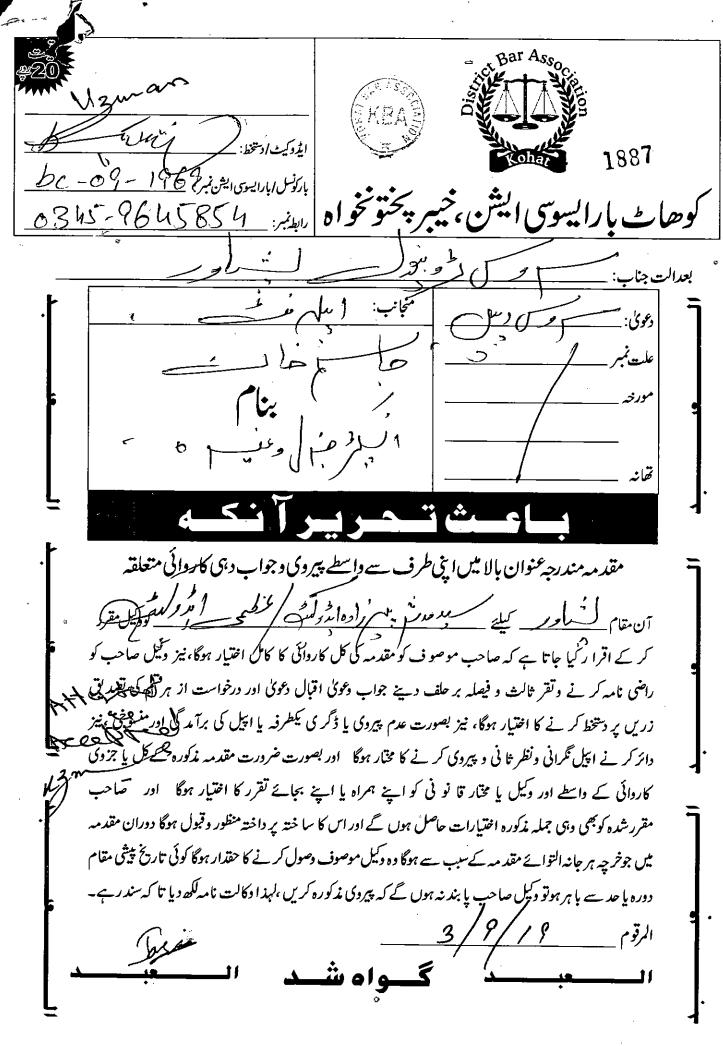
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20/8/40

Region Police Off

Region Police Officer, Kohat Region

19/2019





BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1130/2019

Jasim Khan Ex-Const: No. 552Appellant

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, & others

. Respondents

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS

Respectively Sheweth:-

Parawise comments on behalf of Respondent are submitted as under:-

Preliminary Objections:-

- a) That the appellant has got no cause of action.
- b) That the appellant has got no locus standi.
- c) That the appeal is not maintainable in the present form.
- d) That the appellant is estopped to file the instant appeal for his own act.
- e) That the appellant has not come with clean hands to this Honorable Tribunal.

FACTS:-

- 1. The appellant was involved in smuggling of narcotics. The information was confirmed through reliable source by respondent No.3. Therefore, departmental proceeding were conducted against the appellant.
- 2. Pertains to record, hence no comments.
- 3. In correct, all coddle formalities were fulfilled by respondent No.3, during the course of enquiry.
- 4. The appeal of the appellant was devoid of merits and the appellant failed to submit any plausible explanation during the course of hearing, hence the department appeal was rejected on merits by respondent No. 2.
- 5. Incorrect, the departmental proceedings were conducted in accordance with law and rules.
- 6. As per relevant rules of the Khyber Pakhtunkhwa, Police Rules 1975 (amendments 2014) issuance of show cause notice is not mandatory.
- 7. Incorrect, there was sufficient material regarding involvement of appellant in extra departmental activities.
- 8. Pertains to record, hence no comments.
- 9. Pertains to record, hence no comments.
- 10. Incorrect, regular inquiry was conducted against the appellant by the respondent No. 3 with appointment of an inquiry officer.

- 11. Incorrect, the respondent No. 3 had satisfied himself from the available record and other sources, regarding involvement of appellant in extra departmental activities.
- 12. The appellant estopped to file the instant appeal for his own act.

Grounds:-

- A. Incorrect, respondent No. 3 had passed a legal and speaking order in accordance with rules.
- B. Incorrect, sufficient evidence was available on file which connected the appellant with the commission of misconduct.
- C. Incorrect, the order passed by respondent No. 3 is in accordance with rules.
- D. Incorrect, the impugned is based on facts and evidence collected by respondent No. 3
- E. Irrelevant, hence no comments.
- F. Incorrect, the departmental appeal of the appellant was entertained by the respondent No. 2 vide order dated 07.08.2019. Further, regarding the case reference made by the appellant in this para, it is submitted that each case has its own facts and merits.
- G. It is submitted that each and every case has its own facts, circumstances and merits.
- H. The respondents may also be allowed to advance other grounds during the course of hearing.

In view of the above, it is prayed that the appeal may graciously be dismissed.

Dy: Inspector General of Police, Kohat Region, Kohat

(Respondent No. 2)

Inspector General of Police, Khyber Pakhtunkhwa, (Respondent No. 1)

District Police Officer, Kohat

(Respondent No. 3)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1130/2019

Jasim Khan Ex-Const: No. 552

.....Appellant

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, & others

.. Respondents

COUNTER AFFIDAVIT

We, the below mentioned respondents, do hereby solemnly affirm and declare on oath that contents of reply to restoration application are correct and true to the best of our knowledge and belief. Nothing has been concealed from this Hon: Tribunal.

Dy: Inspector General of Police, Kohat Region, Kohat (Respondent No. 2)

Khyber Pakhtunkhwa, (Respondent No. 1)

Inspector General of Police,

District Police Officer, Konat

(Respondent No. 3)

POLICE DEPTT:

KOHAT REGION

ORDER.

This order will dispose of a departmental appeal, moved by Ex-Constable Jasim No. 552 of Operation Kohat against the punishment order, passed by DPO Kohat vide OB No. 714, dated 20.06.2019 whereby he was awarded major punishment of dismissal from service on the allegations of his involvement in narcotics smuggling.

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I have gone through the available record and came to the conclusion that the allegations leveled against the appellant are proved and the same has also been established by the E.O in his findings. Therefore, his appeal being devoid of merits is hereby rejected.

Order Announced 07.08.2019

(TAYYAB HAFEEZ) PSP

Region Police Officer, Kohat Region.

No. 732-6

/EC, dated Kohat the

7201

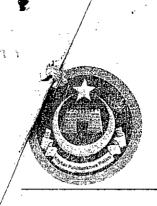
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Con nexton

(TAYYAB HAFEEZ) PSP

Region Police Officer

19 /2019



OFFICE OF THE DISTRICT POLICE OFFICER, KOHAT

Tel: 0922-9260116 Fax 9260125

ORDER

This order is passed on the departmental enquiry (summary proceedings) against Constable Jasim No. 552 under the Khyber Pakhtunkhwa Police Rules, 1975 (amendment 2014).

Brief facts of the case are that constable Jasim Khan No. 552 posted at Commissioner squad are indulged in narcotics smuggling as well as his father namely Shah Afzal is also involved in the business of narcotics.

He was served with Charge Sheet & Statement of Allegations, ASP Saddar, Kohat was appointed as enquiry officer to proceed against him departmentally. Enquiry officer submitted his finding report and stated that the defaulter official was given full opportunity for cross examination / defense but he failed and could not produce any satisfactory reply.

The defaulter official was called in O.R on 19.06.2019 and heard in person, but he failed to advance any plausible explanation.

I have gone through record, which is found indifferent. The accused official earned 12 bad entries in his whole service. He was also involved in drinking of wine and supporting the drugs paddlers, hence in this allegations and above misconducts, he is hereby the declared the black mole on the image of Khyber Pakhtunkhwa Police.

Therefore, in exercise of power conferred upon me under section 5 (2) of KP Police Rules (amendment 2014)1975, the general proceedings are dispensed with and a punishment of summarily <u>dismissal from service</u> is imposed on accused constable Jasim No. 552 with immediate effect.

Announced

19.06.2019

DISTRICT POLICE OFFICER, KOHAT 20/6

OB No. 719 Date 20-6- /2019

No 75/6-19 /PA dated Kohat the 20-6-2019.

Copy of above to the:-

- 1. R.I Police Lines is hereby directed to collect kit etc from accused official and report.
- 2. Reader/SRC/OHC/Pay Officer for necessary action.



OFFICE OF THE ASST; SUPERINTENDENT OF POLICE, SADDAR CIRCLE KOHAT

Email:aspsaddarkt@gmail.com Phone:0922-9260120

No. 1244/S

Dated: / 3 /06/2019

Subject: **DEPARTMENTAL INOUIRY**

Enclosed please find herewith a Departmental Enquiry against Constable JASIM No. 552 is submitted for your favour of worth perusal and further orders please.

MUHAMMAD NABIL KHOKHAR ASP/SDPO SADDAR,

KOHAT

Encl: 20

(2)

DEPARTMENTAL INQUIRY AGAINST CONSTABLE JASIM NO. 552

Charge Sheet was issued to Constable Jasim No. 552 vide DPO, Kohat office letter No. 5950-51/PA dated 09.05.2019 and undersigned was appointed Inquiry Officer. Following allegations were levelled against Constable Jasim No. 552:-

"You constable Jasim Khan No. 552 posted at Commissioner Squad are indulged in narcotics smuggling as well as your father namely Shah Afzal is also involved in the business of narcotics."

He submitted his written reply in response to the Charge Sheet and stated that he is neither involved in any illegal activity nor in narcotics smuggling since his induction in police force. He said that its only being done to damage his reputation. However, he admitted that his father is heroin addict and he also remained in rehab to get rid of this. He denied the allegations leveled against him. He also presented an affidavit in this respect (Attached).

DSB was also approached to get latest information about Constable Jasim No. 552. As per DSB's report, Constable Jasim No. 552 is a drinker. However, there is no news or information about his involvement in Narcotics Smuggling. His father has been charged in Narcotics Cases in the past (Attached).

Findings:-

- > Constable Jasim No. 552 is a drinker and still drinks wine regularly.
- ➤ However, no information / evidence of his involvement in Narcotics Smuggling.
- ➤ His father Shah Afzal is Heroin addict and has been charged in Narcotics Cases in past for his involvement in Narcotics Selling.

Recommendations:-

In the light of the above mentioned findings, undersigned is of the view that Constable Jasim No.552 is not involved in Narcotics Smuggling. However, he drinks wine which is misconduct on his part.

Submitted for appropriate punishment please.

MUHAMMAD\NABIL KHOKHAR ASP/SDPO SADDAR,

KOHAT

جناب عالی!

کانشیبل جاسم ولد شاہ افضل سکنہ تور چھپری بانڈہ جسکی خفیہ معلومات و پیتہ براری کی گئی پایا گیا کہ ندکوار پولیس لائن میں ڈیوٹی سرانجام دے رہا ہے مذکورہ کانشیبل شراب پینے کا عادی ہے اور موجوالوقت بھی بیتا ہے جبکہ شراب فرکی کی بابت کسی بھی شخص/اشخاص نے لب کشائی نہیں کی تاہم کڑی نگرانی جاری ہے جبکہ مذکورہ کا والد سمی شاہ افضل ولد پردل سکم تورچھبری بانڈہ جو کہ ہیروئن پینے کا عادی ہے ایک ماہ قبل تھانہ MRS نے گرفتار کرکے مذکورہ کے خلاف مقدمہ درج رجسڑکیا مصمی شاہ افضل قبل ازیں ٹینکچر مربیروئن فروختگی میں ملوث رہا ہے لیکن تقریباً ایک ماہ سے خاموش ہونا بیان ہوا ہے کڑی نگرانی جاری ہے اگر ملوث پایا گیا تو بروقت افسران بالا کے نوٹس میں لایا جائے گا۔



4.

Office of the District Police Officer, Kohat

Dated <u>08-5-/2019</u>

CHARGE SHEET.

KOHAT, as competent authority under Khyber Pakhtunkhwa Police Rules (amendments 2014) 1975, am of the opinion that you **Constable Jasim No.** 552 rendered yourself liable to be proceeded against, as you have committed the following act/omissions within the meaning of Rule 3 of the Police Rules 1975.

You constable Jasim Khan No. 552 posted at Commissioner squad are indulged in narcotics smuggling as well as your father namely Shah Afzal is also involved in the business of narcotics.

- 2. By reasons of the above, you appear to be guilty of misconduct under Rule 3 of the Rules ibid and have rendered yourself liable to all or any of the penalties specified in the Rule 4 of the Rules ibid.
- 3. You are, therefore, required to submit your written statement within 07days of the receipt of this Charge Sheet to the enquiry officer.

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

A statement of allegation is enclosed.

DISTRICT POLICE OFFICER,
KOHAT



Office of the District Police Officer, Kohat

Dated/2	019
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DISCIPLINARY ACTION

I, <u>CAPT</u> ® <u>WAHID MEHMOOD</u>, <u>DISTRICT POLICE</u>

OFFICER, KOHAT as competent authority, am of the opinion that you

Constable Jasim No. 552 have rendered yourself liable to be proceeded against departmentally under Khyber Pakhtunkhwa Police Rule 1975 (Amendment 2014) as you have committed the following acts/omissions.



STATEMENT OF ALLEGATIONS

You constable Jasim Khan No. 552 posted at Commissioner squad are indulged in narcotics smuggling as well as your father namely Shah Afzal is also involved in the business of narcotics.

2. For the purpose of scrutinizing the conduct of said accused with reference to the above allegations **ASP Saddar Kohat** is appointed as enquiry officer. The enquiry officer shall in accordance with provision of the Police Rule-1975, provide reasonable opportunity of hearing to the accused official, record his findings and make, within twenty five days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused official.

The accused official shall join the proceeding on the date, time and place fixed by the enquiry officer.

DISTRICT POLICE OFFICER, KOHAT #1 9/0

No. 5950-51/PA, dated 08-5-/2019.

Copy of above to:-

1. **ASP Saddar Kohat:-** The Enquiry Officer for initiating proceedings against the accused under the provisions of Police Rule-1975.

2. The **Accused Official:** with the directions to appear before the Enquiry Officer, on the date, time and place fixed by him, for the purpose of enquiry proceedings.

بيان از ال كنشيل جاسم خان نمبر 552 متعينه كمشنر سكوا ذكوها ث

عنوان: محكمانه كارروائي، جارج شيث، خلاصه الزامات

ريفرنس جنابDPOصاحب كوهاث آفس نمبر 5950-5950 مورخه 2019-05-09 بمطابق عنوان بالا

جناب عالى!

بحواله مشمول نقل جإرج شيث اورسمري آف اليكيشن معروض خدمت مول كهز

جھ پر جوالزام ہے۔ کہ آپ نشیات سمگانگ میں ملوث ہیں۔ نہایت ادب کے ساتھ عرض ہے۔ کہ مورند 2009-08-01 سے محکمہ پولیس میں بحثیت کنشیل فرائض سرانجام وے رہا ہوں۔ تاریخ بحرتی سے لے کر آج تک میرے خلاف کوئی محکمانہ کا رروائی نہیں ہوئی ہے۔ اگر میں کی مشیات سملنگ میں ملوث رہا ہوں۔ تو اندریں بارہ میرے خلاف متعلقہ آفیسر شہادت پیش کرے۔ موجودہ وقت میں جہاں میری تعیناتی ہے اس انچارج سے رپورٹ لی جائے۔ میرے خلاق جو الزامات ہیں۔ وہ می سائی شہادت کے زمرے میں ہو سکتے ہیں۔ گاؤں علاقہ میں پھے ذاتی امور کے سلطے میں لوگوں کے ساتھ ہماری نہ گی ہے۔ بدیں وجہ میری شہرت کو نقصان پہنچانے کے لیے لوگ میرے خلاف بغیر ثبوت الزامات لگا رہے ہیں۔ اگر میرے خلاف کوئی چشم دیدگواہ وغیرہ ہے تو میرے سامنے لاکر جھے جرح کا موقع دیا جائے۔ میرے خلاف لگائے گئے الزامات ب بنیادہ من گھرے اور نی سائی شہادت پر مختفر ہیں۔

۔ جہاں تک میرے والد کا تعلق ہے۔ اس میں کوئی شق نہیں کہ وہ منشیات پینے کا عادی ہے۔ ہیروئن پینے کی وجہ سے نہ صرف میرے والد کی صحت تباہ بر با دہوگئی ہے۔ بلکہ علاج معالج کرنے بر کافی خرچ بھی کر چکے ہیں۔

سوال یہ پیدا ہوتا ہے کہ میرے والد کو نشیات رہیروئن پینے پر عادی کس نے بنایا۔ صاف ظاہر ہے کہ ان لوگوں نے بنایا۔ جواس علاقے میں بدستور منشیات از تتم ہیروئن فروخت کر رہے ہیں۔ اور ان کے خلاف منطق کارروائی اب تک نہیں ہوئی ہے۔ میں اب بھی والد کا وقتا فوقتا محدود نخواہ میں علاج کروا تا آر ہا ہوں۔ میرے والد جو ہیروئن نوشی کا عادی ہے۔ اس کی سزا مجھے کیسے دی جارہی ہے۔ جوقا نو نا خلاف قانون ہے۔ اگر اس اصول پر میرے خلاف کارروائی کی جاتی ہے تو اس محکمہ میں دیگر اہلکار موجود ہیں۔ جو کسی نہ کی طرح ان کا کوئی رشتہ دار کی خلاف قانون فعل میں ملوث ہے۔

أخريس ايك دفعه پر ملتمس مول كه مير ب والد كے علاج معالجه ميں ميرى مدوكى جائے مير ب خلاف الزام ب بنيادين-

مور ند 2019-05-18

ا منان نمبر 552 مان نمبر 552 متعینه نمشز سکوادٔ کوهاٹ 10 04-5-9 10181415

از دفتر ASP صدر سركل كوباك_

ريدُرنمبرا <u>988 امورخه 019.4. کان ۵</u>

جنابDPO صاحب کوہائے۔

پچا شيا:

LIST OF CRIMINALS INVOLVED IN HENIOUS CRIMES

عنوان:

بكارسركار!

بىلىلە چىن كى نمبرى 3269-RK مورند 11.4.2019 نبرى 3399-RK مورند 16.4.019 مۇرند 16.4.019 مۇرند 16.4.019 مۇرند 16.4.019 مۇرند 16.4.019 مۇرند 16.4.019 مۇرنى كى بابت رپورت SHO مۇرۇنى دەرەت بول يەرىنى DPO مۇرۇنى ئىرىدى كى بابت رپورت SHO مۇرۇنى ئىرىدى ئالىرىدى كى بابت رپورت SHO مۇرۇنى ئىرىدى ئالىرىدى كى بابت رپورت كى بىرت رپورت كى بابت رپورت

ملاحظہ ہے۔ رپورٹ (۱۳۵۷ سے پایا گیا۔ کہ سلام نبرشار شار الزام 1 مارولدیو بھر الزام الور معدام ولدیو بھر کا شاہ پور معداد خان ولد سمندر خان سکنہ طور جھر کا شاہ پور معاذ خان ولد سمندر خان سکنہ طور جھری شاہ پور

جناب عالى! جنائ بنال المال المحالي في الله على المحالي في الله عن الله المحالي الله المحالية المحالية المحالية المحالية ال

به بنیاد میں۔(حلفیہ بیانات لف میں)۔

المنظم خان نمبر 552 محکمہ پولیس کو ہائے میں کانٹیبل ہے۔او **ارندکورہ کمشنر**صاحب کو ہائے کیساتھ اسکواڈ ڈیوٹی کرتا کہتے۔ کا والدشاہ ا^{نفیا}ل

خان جی منشات فروش ہے۔اور ندکورہ کانشیبل بھی اس مکروہ دھندہ میں مکوئے ہے۔ جہمسمی صدام خان جو کہ ہائی سکول معل گڑھی شاہ پور میں کلاس فور ملازم ہے۔جو پہند براری پرواقعی نشیات فروش ٹیسیا میشدہ است اور است

صدام خان وزیرسیفران جناب شهریارآ فریدی کاپرسنل گنرہے۔

۔ ﷺ نو فی کاروائی: آپانو فی کاروائی:

﴿ مهمیان صدام اور معاذ خان کیخلاف کاروائی انسدادی عمل میں لائی گئی ہے۔ (نقل استغاثہ لف ہے)۔

سفارش:

جلار پورٹ SHO کے مطابق کانشیبل جاسم خان نمبر 552 جومحکمہ پولیس میں ہوتے ہوئے۔اس غیر قانونی اور کروہ دھندے ہیں کوت سے۔اس سلسلے میں سخت محکمانہ انکوائیری کی اور کانشیبل مذکورہ کی مناسب جگہ پر تعیناتی کی سفارش کی جاتی ہے۔

ہے۔ اس سلسلے میں حت علمانہ انوا میری می اور کا میں مدورہ می مناسب جلہ پرسیاں کی صفاری کا جائے۔

ﷺ من صدام خان جو محکمہ ایجو کیشن میں کلاس فور اور وزیر سیفر ان جناب شہر یار آفریدی کا بہٹل گنر ہے۔ اس باہت تحکمانہ کاروائی کریے گئے۔

ﷺ DEO کو باٹ اور برائے آگا ہی جناب وزیر سیفر ان شہر یار آفریدی صاحب کوڈا کٹ انگریز ی تحریر کرنے کی سفارش کی سان سنو

نے معاد خان جواکثر اوقات تھانہ ٹی کے حدود میں قمار بازی کھیلیا ہیں۔ کے بابت بخت گرانی اور کاروائی کے بابت SHO تھا نہ ک

دین کی سفارش کی جاتی ہے۔ رپورٹ بیش خدمت ہے۔

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5/11/85 13/10/10/2010 prover 15 030 380 4185 ver is city 3 cive Constitution with its 2018/16 (3906) 3:2/10 (10/2) 1/01 1/2019 him = 10000/10/3/0000 13/10/3/1000 Best rentrible & Glapine in 3/165 US UNO 562 (3) MBM 6501630 (1806) Sule (19165 2 / jos ely informisola promine is illy is the class Acoldes 0 1 13 (30 p3) 5 10 20 552 flo 350 260 (i) 18/3 of 1/1 (1) color 3 = 100.5 Circa displing (solo (1) bolie 9CXISA (1918, 04 20652 6965CNSA (1923) Per 659 363 Diliver-welfille sing Esons win 1785 ils "you the sed with the sed of cise of 2 2 Life or eight of the Stop DSB // 11/5 (Propose political) 200/161

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TOP SECRET The Deputy Inspector General of Police, From: Special Branch, Khyber Pakhtunkhwa, Peshawar. The Deputy Inspector General of Police, To: Kohat Region, Kohat. 04/04/2019. 3(-3)/CIU/SB, dated Peshawar the: LIST OF CRIMINALS INVOLVED IN HEINOUS CRIMES Subject: Memo: Enclosed please find herewith list of persons involved in different crimes & vices shown against their names. Deterrent action under existing laws may be taken against them under intimation to this office please. Enclosed Pages 03 Involved persons 14 radu For Deputy Inspector General of Police, Special Branch, Khyber Pákhtunkhwa, Peshawar. /CIU/SB, No. Copies of the about are forwarded to the:-DONT KRILL Hanger

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For Deputy Inspector General of Police,

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SUSPECTS INVOLVED IN DRUG PEDDLING DISTRICT KOHAT

PSAIRS		·		
S.no Name and add	zoli Khan r/o Tor Chapri S	Shapoor	22.11. 11.	1.4.
2. Saddam s/o Y	ar Muhammad 1/0 Tor Ch	apri Shapoor		

SUSPECTS INVOLVED IN GAMBLING

PS: CIT	Y
S.no	Name and address Maaz khan s/o Samandar Khan r/o Tor Chapri Banda Shapoor
1.	Maaz khan s/o Samahdar Khan w

No. 236/417. المراد ال 05/115-04,20/8. A Cas Mas Stein by & Egil Colling der light in Up risk de 10 july com 8601/10 /10/15/ 2 9 JW CM 3, 16379N في نم رق كي ورود عبى روي كي ري روي كي در ورطور الله CEMRS PUS 11201790 g. L. 60 1/60 6/1/ Lipolita 12 olivatilo et 12h My MRs 265 (119) 6 (3) 62/16/100 (18) Le Sty Dildi- Ce Col For or Regal action Mean ALG 14-04-18 (inthis lid Jeld fearly DR 3/2) chelp-mps cosciels The matter related to PS. MRS, May be Sent to SDRO/Saddar lised action Pl. 14-4-19 refert. District Police Officers

The Deputy Inspector General of Police, From: Special Branch, Khyber Pakhtunkhwa, Peshawar. The Deputy Inspector General of Police, To: Kohat Region, Kohat. 04/04/2019. dated Peshawar the: 3L3/CIU/SB, LIST OF CRIMINALS INVOLVED IN HEINOUS CRIMES Subject: Memo: Enclosed please find herewith list of persons involved in different crimes &vices shown against their names. Deterrent action under existing laws may be taken against them under intimation to this office please. Enclosed Pages 03 Involved persons 14 eady SSP/Admin For Deputy Inspector General of Police, Special Branch, Khyber Pakhtunkhwa, Peshawar. /CIU/SB. No. Copies of the above are forwarded to the:-1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar. Aldrewith dist of flason involvation different Crimes & vices shown against then warnes for information & n / Regal action Please. 3/60 SSP/Admin For Deputy Inspector General of Police, Special Branch, Khyber Pakhtunkhwa, Peshawar. Astisnador and DsP/13 For necessary degal nelvo Meciso DIG POLICE KOHAT 10/4/2017 For mi lesert site. repent. District Police Officer

SUSPECTS INVOLVED IN DRUG PEDDLING DISTRICT KOHAT

/	PS:MR	<u> </u>	 	÷ļ	_
1	Sino	Name and address	 - ;	1	
ľ		Jasim s/o Shozali Khan r/o Tor Chapri Shapoor	 		
1	2.	Saddam s/o Yar Muhammad r/o Tor Chapri Shapoor	 		_

SUSPECTS INVOLVED IN GAMBLING

PS: CIT	Y	
S.no	Name and address	
· 1.	Maaz khan s/o Samandar Khan r/o Tor Chapri Banda Shapoor	

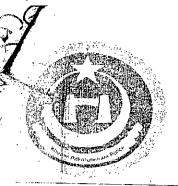
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and engly in fine of i poly Institute; 00/1 /1/09012/3/04.6.18 (1/1/10 (1/2/13) or welling where Ble Mant & volus TPUS MININE 23/04/18 MRS (SINO UN) مَهُ مَنْ لَى جَامِعُمُ وَانْ مُرْ عِنْ مِنْ مُورِدُ مِنْ الْمُرْ مِنْ الْمُرْدُ لِلْمُ الْمُرْدُ الْمُرْ Capitalist of the best of the district instruction of the form (3 Ever wife) 图花面如何的是我这有它的一种的心态。 من على والمراب المرابي المرابي المرابي المرابي 2 Weller Mile Junior to Estillie Mary in anomalien windlessine The Minimum of the on the State of the State menting of the first the the train of the and the thirty the said

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OFFICE OF THE DISTRICT POLICE OFFICER, KOHAT

Tel: 0922-9260116 Fax 9260125

ORDER

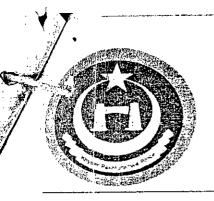
The Following officials absented themselves from

(.)	Hiciais duties tr	om vario	us places as noted	against each:-		a dichiserves from
5.#	I Rambi	No	Place Of Posting	DD No. With date	1 15 2 2 2 2 2 2 2	16.1 555
3, .	IC Yasir	11111	PS KDA	DD No.08, dt: 08.03.2019to	Remarks	Order DPO
ŀ				DD No.10, dt: 08.03.2019	01 Hours	Warning to be careful in
2.	LC Muhammad	579	PS Usterzai	DD No.25, dt: 18.03.2019to		future
1	Afzat		, , , , , , , , , , , , , , , , , , , ,	DD No.15, dt: 19.03.2019	01 day	Absence period is treated
3.	10 Tanveer Ati	1236	Police Lines	DD No.34, dt: 16.03.2019 to		as leave without Pay
:	1	}		DD No.31, dt: 18.03.2019	01 days	Absence period is treated
4.	FC Zubair	942	Police Lines	DD No.34, dt: 16.03.2019 to		as leave without Pay
1	Refuman	•		DD No.31, dt: 18.03.2019	01 days	Absence period is treated
5.	FC Qanat Ali	1099	Police Lines	DD No.34, dt: 16.03.2019 to		as leave without Pay
:	-			DD No.31, dt: 18.03.2019	01 days	Absence period is treated
6.	FC Shahjehan	801	Police Lines	DD No.19, dt: 16.03.2019 to	(1)	as leave without Pay
İ	į.			DD No.34, dt: 18.03.2019	02 days	Absence period is treated
	FC.Muhammad	873	PS Usterzai 🖫	DD No.17, dt: 12.03.2019 to	00	as leave without Pay
	Iqba		9	DD No.20, dt: 14.03.2019	02 day	Absence period is treated
8.	「∴ Jasim Khan	552	Police Lines	DD No.29, dt: 07.03.2019 to		as leave without Pay
				DD No.42, dt: 08.03.2019	H Hours	Warning to be careful in
19.	l Nacem	1262	Police Lines	DD No.08, dt: 08.03.2019 to		future
				DD No.33, dt: 09.03.2018;	01 day	Absence period is treated
10.	J C Tanveer Alf :	1236	Police Lines	90 No.17, dt: 07.03.2018 to		as leave without Pay
				DD No.06, dL: 10.03.2018	03 day	Absence period is treated
111.	FC Initiaz	1283	Police Lines	DD No.24, dt: 11.03.2018 to		as leave without Pay
1.			i l	DD No.06, dt: 12.03.2018	13 Hours	Warning to be careful in future
17.	LC Shehzada	892	Police Lines	DD No.23, dt: 11.03.2019 to	14 Hours	
1				DR No.12, dt: 12.03.2019	14 110018	Warning to be careful in future
13.	FC Hamid	1157	Police Lines	DD No.23, dt: 11.03.2019 to	14 Hours	·
į	- Curaishi		-	DD No.12, dt: 12.03.2019	134 110th S	Warning to be careful in ?
id.	FC Qanat Ali	1099	Police Lines	DD No.39, dt: 07.03.2019 to	05 day	Absence period is treated
				DD No.06, dt: 12.03.2019	Op day	as leave without Pay
15.	In Rahib Ati	364	Police Lines	DD No.24, dt. 11.03.2019 to	13 Hours	Warning to be careful in
		-	1	DD No.06, dt: 12.03.2019	15 From S	future
16	TC Zubair	942	Police Lines	DD No.24, dt: 11.03.2019 to	13 Hours	Warning to be careful in
1	Rehman			DD No.06, dt: 12.03.2019	TO THOUS	future
17.	FC Imtiaz	1009	Police Lines	DD No.24, dt: 11.03.2019 to	13 Hours	Warning to be careful in
40	CC Owker Air	-		DD No.06, dt: 12.03.2019	· · · · · · · · · · · · · · · · · · ·	future
18.	FC Rahib Ali	364	Police Lines	DD No.35, dl. 22.03.2019 to	01 days	Absence period is treated
i	4	١. :		DD No.34, dt: 23.03.2019		as leave without Pay
	$\hat{\chi}_i$				" [-]	r.,

DISTRICT POLICE OFFICER, KOHAT

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OFFICE OF THE DISTRICT POLICE OFFICER, KOHAT

Tel: 0922-9260116 Fax 9260125

ORDER

The Following officials absented themselves from

Officials duties from various places as noted against each:-

5.#	Name	No	Place Of Posting	DD No.With date	Remarks	Order DPO
1.	FC Mukhtiar Hussain	693	P5 Billitang	DD No.34, dt: 02.10.2018 to DD No.45, dt: 14.10.2018	12 days	Issue Him Show Cause Notice
2.	FC Aman	1338	Police Lines	DD No.04, dt: 02.11.2018 to DD No.18, dt: 14.12.2018	12 days	Issue Him Show Cause Notice
3.	FC Abid	67/SPF	PS MRS	DD No.21, dt: 02.12.2018 to DD No.29, dt: 27.11.2018	05 days 🕦	Absence period is treated as leave without Pay
4.	FC Yasir	257	Police Lines	DD No.23, dt: 17.12.2018 to DD No.33, dt: 18.12.2018	11 Hours	Warning to be careful in future
5.	FC Asghar Abbas	810	Police Lines	DD No.23, dt: 17.12.2018 to DD No.33, dt: 18.12.2018	11 Hours	Warning to be careful in future
6.	FC Wajid	745	Police Lines	DD No.23, dt: 17.12.2018 to DD No.33, dt: 18.12.2018	11 Hours	Warning to be careful in future
7.	FC Fazal Abbas	436	Police Lines *	DD No.23, dt: 17.12.2018 to DD No.33, dt: 18.12.2018	11 Hours	Warning to be careful in future
8.	FC Amshaid	813	Police Lines	DD No.23, dt: 17.12.2018 to DD No.33, dt: 18.12.2018	11 Hours	Warning to be careful in future
9.,	FC Zafar	350	Police Lines	DD No.23, dt: 17.12.2018 to DD No.33, dt: 18.12.2018	11 Hours	Warning to be careful in future
10.	FC Rahib Ali	364	Police Lines	DD No.23, dt: 17.12.2018 to DD No.33, dt: 18.12.2018	11 Hours	Warning to be careful in future
11.	FC Shahid Mehmood	812 ·	Policé Lines	DD No.23, dt: 17.12.2018 to DD No.33, dt: 18.12.2018	11 Hours	Warning to be careful in future
12.	FC Muhammad Zubair	942	Police Lines	DD No.23, dt: 17.12.2018 to DD No.33, dt: 18.12.2018	11 Hours	Warning to be careful in future
13./	FC Jasim	552	Police Lines	DD No.23, dt: 17.12.2018 to DD No.33, dt: 18.12.2018	11 Hours	Warning to be careful in future
14.	FC Falak Naz	519	Police Lines	DD No.23, dt: 17.12.2018 to DD No.33, dt: 18.12.2018	11 Hours	Warning to be careful in future
15.	FC Shakil	392	Police Lines	DD No.23, dt: 17.12.2018 to DD No.33, dt: 18.12.2018	11 Hours	Warning to be careful in future
16.	LHC Sher Zaman	1403	Police Lines	DD No.23, dt: 17.12.2018 to DD No.33, dt: 18.12.2018	11 Hours	Warning to be careful in future
17.	FC Husnain Habib	917	Police Lines	DD No.30, dt: 15.12.2018 to DD No.14, dt: 16.12.2018	01 day	Absence period is treated as leave without Pay
18.	FC Tariq	109	Police Lines	DD No.23, dt: 14.12.2018 to DD No.28, dt: 17.12.2018	02 days	Absence period is treated as leave without Pay
19.	FC Basit	77/SPF	Police Lines	DD No.44, dt: 20.12.2018 to DD No.37, dt: 21.12.2018	01 day	Absence period is treated as leave without Pay
20.	FC Fayaz Ahmad	368	Police Lines	DD No.35, dt: 19.12.2018 to DD No.26, dt: 23.12.2018	04 day	Absence period is treated as leave without Pay
21.	FC Akhtar Gul	386	Police Lines	DD No.35, dt: 19.12.2018 to DD No.15, dt: 23.12.2018	04 day	Absence period is treated as leave without Pay
22.	FC Naeem Shah	1262	Police Lines	DD No.12, dt: 19.12.2018 to DD No.15, dt: 23.12.2018	04 day	Absence period is treated as leave without Pay
23.	FC Saeed Anwar	751	Police Lines	DD No.12, dt: 19.12.2018 to DD No.15, dt: 23.12.2018	04 day	Absence period is treated as leave without Pay
24.	FC Adnan	764	Police Lines	DD No.26, dt: 21.12.2018 to DD No.14, dt: 22.12.2018	14 Hours	Warning to be careful in future
25.	FC Fazal Abbas	436	Police Lines	DD No.26, dt: 21.12.2018 to DD No.34, dt: 22.12.2018	11 Hours	Warning to be careful in \future

DISTRICT POLICE OFFICER, KOHAT

OB No 2 2 /2019

on the fifty 12 12 13 21 33 131 1001 & 07:35 52 18 18 12 12 who respect 1/0/20 32 1 11/2 / 14/02 0 2/10 988 Will Shirt 32 May 136 Just 745 My 810 Course 18 Milly 212 2 Julie 344 Just 1, 350 job Belleville 1292, par, 519 July 552 16 240 1 100 m 17 18 13 10 1 23 10 11 15 The state of the s The house of the English of the and the open to be the company with 16400 edgas po MIS mm. Cincilet 18-12-18 18-18-18 forwarded Hars: Kohala— 28-12-08

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OFFICE OF THE DISTRICT POLICE OFFICER, KOHAT

Tel: 0922-9260116 Fax 9260125

ORDER

The Following officials absented themselves from

Officials luties from various places as noted against each:-

\$.#	Name	No	Place Of Posting	DD No. With date	Remarks	Order DPO
1,	FC Arehar Abbas	310	PP Ghamkol Sharif	DD No.06, dt: 05.01.2019 to DD No.15, dt: 07.01.2019	02 day	Absence period is treated as leave without Pay
2.	FC Uniar Khan	1395	PS Jangle Khel	DD No.07, dt: 13.01.2019 DD No.11, dt: 13.01.2019 to	01 Hours	Warning to be careful in future
3.	FC Ahmad Raza	499	Police Lines	DD No.36, dt: 08.01.2019 to DD No.48, dt: 09.01.2019	10 Hours	Warning to be careful in future
4.	LHC Basit Ali Shah	958	Police Lines	DD No.36, dt: 08.01.2019 to DD No.48, dt: 09.01.2019	10 Hours	Warning to be careful in future
5.	FC Sarnar Raza Kiyani	602	Police Lines	DD No.20, dt: 03.01.2019 to DD No.38, dt: 05.01.2019	01 day	Absence period is treated as leave without Pay
6	FC Adnan	574	Police Lines	DD No.13, dt: 02.01.2019 to DD No.39, dt: 08.01.2019	06 day	Absence period is treated as leave without Pay
7.	FC Murntaz/Ex	3813	Police Lines 💲	DD No.35, at: 03.01.2019 to DD No.65, dt: 10.01.2019	20 hours	Warning to be careful in future
8.	D/FC Ali Ghulam	1255	MT STaff	DU No.11, dr: 15.01.2019 to DD No.12, dt: 07.12.2018	02 day	Absence period is treated as leave without Pay
9.	FC Zia ur Rehmani	500	Police Lines 。	DD No.35, dt: 05.01.2019 to 5 DD No.19, dt: 06.01.2019	01 day	Absence period is treated as leave without Pay
10.	FC Zia ur Rehman'	600	Police Lines	DD No.27, dt: 02.01.2019 to DD No.36, dt: 03.01.2019	11 hours	Warning to be careful in future
11.	FC Agib Jbrar	03/SPF	PS City	DD No.43, dt.: 14.01,2019 to DD No.18, dt.: 15.01,2019	10 hours	Warning to be careful in future
1	FC Qasim Shah	50/SPF	PS City	DØ No.43, at: 14.01.2019 to DØ No.44, dt: 17.01.2019	02 day	Absence period is treated as leave without Pay
13.	FC Fazat Abbas	436	Police Lines	DD No.46, dt: 09.01.2019 to DD No.56, et: 10.01.2019	11 hours	Warning to be careful in future
14.	FC Zia ur Rehman	600	Police Lines	D0 No.46, ct: 09.01.2019 to DD No.56, dt: 10.01.2019	11 hours	Warning to be careful in future
15.	FC Shakil	392	Police Lines	DU No. 46, 61: 09.01.2019 to DQ No.56, 37: 10.01.2019	11 hours	Warning to be careful in future
16.	FC Rahib Ali	364	Police Lines	DU No.46, 6t: 09.01.2019 to DU No.56, dt: 30.01.2019	11 hours	Warning to be careful in future
17/	FC Jasim	552	Police Lines	D0 No.46, d0: 09.01.2019 to D0 No.56 - d1: 10.01,2019	11 hours	Warning to be careful in future
18.	FC Mehar Ali Shah	159	Police Lines	DD No.36, de: 98,01,2019to DD-No.16, de: 09,01,2019	12 hours	Warning to be careful in future
19.	HC Farid Ulth	1122	Police Lines	DE No.36, dt: 08:01.2019to DD No.16, dc. 09:01.2019	12 hours	Warning to be careful in future
20.	FC Imtiaz	1009	Police Lines	DE No.46, dt. 09,01,2019 to 705 No.56, dt. 10,01,2019	11 hours	Warning to be careful in future
21.	FC Muhammad Zubair	942	Police Lines	DG No.46, dc: 09.01.2019 to DG No.56, dc: 10.01.2019	11 hours	Warning to be careful in future
22.	FC Zeeshan	124	Police Lines	Di) No.41, sr: 14.01,2019 to Di-No.69, st: 15.01,2019	14 Bours	Warning to be careful in future

OB No. 174

Dated 9 , 2 . ____/2019

DISTRICT POLICE OFFICER,

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OFFICE OF THE DISTRICT POLICE OFFICER, KOHAT

Tel: 0922-9260116 Fax 9260125

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The Following officials absented themselves from

Officials duties from various places as noted against each:-

S.#	Name	No	Place Of Posting	DD No.With date	Remarks	Order DPO
1.	Fc Ishfaq	731	PP Khushal Garrh	DD No.10, dt: 09.01.2019 to DD No.06, dt: 10.01.2019	01 day	Absence period is treated as leave without Pay
2.	FC junaid	603	PS gumbat	DD No.14, dt: 16.12.2018 DD No.29, dt: 17.12.2018 to	01 day	Absence period is treated as leave without Pay
3.	FC Waliyat	269	PS Gumbat	DD No.20, dt: 30.12.2018 to DD No.20, dt: 31.12.2018	01 day	Absence period is treated as leave without Pay
4.	LHC Asif	891	PS MRS	DD No.11, dt: 14.11.2018 to DD No.13, dt: 15.11.2018	07 Hours	Warning to be careful in future
5.	FC Sharif	87/SPF	PS MRS	DD No.17, dt: 15.11.2018 to DD No.04, dt: 16.11.2018	15 hours	Warning to be careful in future
6.	FC Waseem	520	PS MRS	DD No.17, dt: 15.11.2018 to DD No.04, dt: 16.11.2018	15 hours	Warning to be careful in future
7.	FC Amjid	105	PS MRS	DD No.08, dt: 02.12.2018 to DD No.04, dt: 03.12.2018	14 hours	Warning to be careful in future
8.	FC Tahir	780	PS MRS	DD No.20, dt: 03.12.2018 to DD No.12, dt: 04.12*2018	10 hours	Warning to be careful in future
9.	Sweeper Rakesh Rahi	245	Police Lines	DD No.36, dt: 03.12.2018 to DD No.09, dt: 02.12.2018	01 day	Absence period is treated as leave without Pay
10.	FC Zeeshan	694	Police Lines	DD No.12, dt: 25.12.2018 to DD No.16, dt: 26.12.2018	01 day	Absence period is treated as leave without Pay
11.	FC Tariq Mehmodd	34/SPF	Police Lines	DD No.45, dt: 28.12.2018 to DD No.38, dt: 29.12.2018 &	01 day	Absence period is treated as leave without Pay
12.	FC Rahib Ali	364	Police Lines	DD No.20, dt: 3.01.2019 to DD No.30, dt: 04.01.2019	11 hours	Warning to be careful in future
13.	FC Shahid Mehmood	812	Police Lines	DD No.20, dt: 3.01.2019 to DD No.30, dt: 04.01.2019	11 hours	Warning to be careful in future
14.	FC Fahad Ali	1150	Police Lines	DD No.20, dt: 3.01.2019 to DD No.30, dt: 04.01.2019	11 hours	Warning to be careful in future
15.	FC Asghar Abbas	810	Police Lines	DD No.20, dt: 3.01.2019 to DD No.30, dt: 04.01.2019	11 hours	Warning to be careful in future
16.	FC Jasim	552	Police Lines	DD No.20, dt: 3.01.2019 to DD No.30, dt: 04.01.2019	11 hours	Warning to be careful in future
17.	FC Muhammad Sohail	151	Police Lines	DD No.37, dt: 27.12.2018 to DD No.46, dt: 28.12.2018	11 hours	Warning to be careful in future
18.	FC Zeeshan	7 33 1256	Police Lines	DD No.37, dt: 27.12.2018 to DD No.25, dt: 28.12.2018	01 day	Absence period is treated as leave without Pay
19.	FC Arif	274	Police Lines	DD No.37, dt: 27.12.2018 to DD No.25, dt: 28.12.2018	01 day	Absence period is treated as leave without Pay
20.	FC Asghar Abbas	810	Police Lines	DD No.37, dt: 27.12.2018 to DD No.38, dt: 29.12.2018	01 day	Absence period is treated as leave without Pay
21.	FC Zia Rehman	294	PS Billitang	DD No.11, dt: 14.11.2018 to DD No.27, dt: 15.11.2018	01 day	Absence period is treated as leave without Pay
22.	FC Akhtar Abbas	66	PS Gumbat	DD No.14, dt: 23.12.2018 to DD No.15, dt: 24.12.2018	01 day	Absence period is treated as leave without Pay
23.	FC Muhammad Junaid	603	PS Gumbat	DD No.14, dt: 16.12.2018 to DD No.29, dt: 17.12.2018	01 day	Absence period is treated as leave without Pay

OB No_____

DISTRICT POLICE OFFICER, KOHAT

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OFFICE OF THE POLICE OFFICER KOMAT

Tel: 9022-9269116 Fax 9260125

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DISTRICT POLICE OFFICER.

KOHAT 20/6

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(John) 4 /g stije 30 (65) 157:48 ciel fg pulo 136/2 11 (26) 30,00 (10)1/150 pro 2810 over 01 (12) Cien 1 5389 E C 500 E 50 912 , FR 10 6 364 JE عنوا برا بال در العام المالي و المرزام را لفيرن Unicological plans of Ciones 0400 20 mich 66 (60) Man ? Forwarday 4-1-18 D-H-M 0:11:45 Lo-line. Kr forwarded 04-01-19 Sub Divisional Police Office

3 / 36,100 wel (rau) ero & institution of the Brich of the Beil りかりにんはいいいんでんでんかって اسال لی در ایک فرن او وق افاقی صال رکسی ىعىرسان فردى كارى اونى الدى را خاست اسى صفى دارى دو 812,3/10,364 (recion) 1150 renio (810 Culie 21, 2 of he Con 62, 5383 - 20 من مال معرفي و المالي و المرابي و المربي و المرب Mecho رفعل می ازی اس سی Forwardeg Mrs. 1-19 20- Gino. Ky-04-01-19



OFFICE OF THE DISTRICT POLICE OFFICER, KOHAT

Tel: 0922-9260116 Fax 9260125

ORDER

The Following officials absented themselves from

Officials duties from various places as noted against each:-

. if	Mame	No	Place Of Posting	DD No.With date	Remarks	Order DPO
·	FC Faz.al Abbas	436	Police Lines	DD No.16, dt: 02.12.2018 to DD No.28, dt: 03.12.2018	09 Hours	Warning to be careful in future
:	LHC Yasir	257	Police Lines	DD No.16, dt: 02.12.2018 to DD No.28, dt: 03.12.2018	09 Hours	Warning to be careful in future
	LHC Ibrar	1369	Police Lines	DD No.16, dt: 02.12.2018 to DD No.28, dt: 03.12.2018	09 Hours	Warning to be careful in future
	FC Waqar	643	Police Lines	DD No.18, dt: 02.12.2018 to DD No.28, dt: 03.12.2018	09 Hours	Warning to be careful in future
<u></u>	Bukhari FC Altaf Ullah	355	Police Lines	DD No.18, dt: 02.12.2018 to DD No.28, dt: 03.12.2018	09 Hours	Warning to be careful in future
	FC Kashif	944	Police Lines	DD No.18, dt: 02.12.2018_to DD No.28, dt: 03.12.2018	09 Hours	Warning to be careful in future
<u></u>	Mehmood LHC Sher Zaman	1403	Police Lines	DD No.18, dt: 02.12.2018 to DD No.28, dt: 03.12.2018	09 Hours	Warning to be careful in future
	FC Muhammad	942	Police Lines	DD No.18, dt: 02,12,2018 to DD No.28, dt: 03.12,2018	09 Hours	Warning to be careful in future
,	Zubair FC Ranib ALi	364	Police Lines	DD No.18, dt: 02.12.2018 to	09 Hours	Warning to be careful in future
0.	FC Tahir Gul	848	Police Lines	DD No.28, dt: 03.12.2018 DD No.18, dt: 02.12.2018 to	09 Hours	Warning to be careful in future
1.	FC Adil Badshah	975	Police Lines	DD No.28, dt: 03.12.2018 DD No.27, dt: 27.11.2018 to	07 Days	Absence period is treate as leave without Pay
·· 2.	FC Ali Raza	26/SPF	Police Lines .	DD No.30, dt: 04.12.2018 DD No.50, dt: 05.12.2018 to	01 Day	Absence period is treate
÷. 3.	FC Ishtiag Ali	31/SPF	Police Lines	DD No.48, dt: 06.12.2018. DD No.50, dt: 05.12.2018 to	01 Day	as leave without Pay Absence period is treat-
	FC Shah	47/SPF	Police Lines	DD No.48, dt: 06.12.2018 DD No.50, dt: 05.12.2018 to	01 Day	as leave without Pay Absence period is treate
4.	Muhammad		Police Lines	DD No.48, dt: 06.12.2018 DD No.50, dt: 05.12.2018 to	01 Day	as leave without Pay Absence period is treate
5.	FC Turab Ali	27/SPF		DD No.48, dt: 06.12.2018 DD No.40, dt: 04.12.2018 to	01 Day	as leave without Pay Absence period is treate
δ.	LHC Mehmood Ul Hassan	1170	Police Lines	DD No.31, dt: 06.12.2018	11 Hours	as leave without Pay Warning to be careful in
7.	FC Basit	77/SPF	Police Lines	DD No.32, dt: 06.12.2018 to DD No.40, dt: 07.12.2018	11 Hours	future Warning to be careful in
3.	FC Turab Ali	27/SPF	Police Lines	DD No.32, dt: 06.12.2018 to DD No.40, dt: 07.12.2018		future Warning to be careful in
9.	FC Ishtiaq Ali	31/SPF	Police Lines	DD No.32, dt: 06.12.2018 to DD No.40, dt: 07.12.2018	11 Hours	future Warning to be careful in
0.	FC Sajid	95/SPF	Police Lines	DD No.32, dt: 06.12.2018 to DD No.40, dt: 07.12.2018	11 Hours	future
1.	FC Falak Naz	519	Police Lines	DD No.32, dt: 06.12.2018 to DD No.40, dt: 07.12.2018	11 Hours	Warning to be careful i
2.	FC Imran	1394	Police Lines	DD No.32, dt: 06.12.2018 to DD No.40, dt: 07.12.2018	11 Hours	Warning to be careful i future
3./	FC Jasim	552	Police Lines	DD No.32, dt: 06.12.2018 to DD No.40, dt: 07.12.2018	11 Hours	Warning to be careful i future
24.	FC Shahid	812	Police Lines	DD No.32, dt: 06.12.2018 to DD No.40, dt: 07.12.2018	11 Hours	Warning to be careful i future
25.	Mehmood Rahib Ali	364	Police Lines	DD No.32, dt: 06.12.2018 to DD No.40, dt: 07.12.2018	11 Hours	Warning to be careful i future

DISTRICT POLICE OFFICER, KOHAT

NO NO 21 /2019

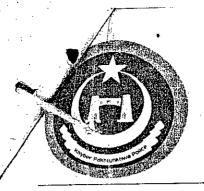


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6 /8 100 Asilo 0 19/1/0/1/0/1/0/0/320 E16(6 (100) Mor 6301 (30:30 0030 الروه و المرام ا و عدد من المراق المورد و عاص منال دروس ورسال وروس الله وروس و 364 JULIU (109 G116 813 12 436 UNGGO 745 19; Wee 1394 Wit (552 2 350 jb 218, 200 is 2000, 27 MUS 27 Jul 131 Je 6 List of Plus عد وجزر بالن ال صل فلا في الراق عير ما ورا ورا وراق عالى الله جناعاتي coowarded ريا المجال القالي 6-12-18 Latine 1e 6-12-18

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OFFICE OF THE DISTRICT POLICE OFFICER, KOHAT

Tel: 0922-9260116 Fax 9260125

ORDER

The Following officials absented themselves from

Officials duties from various places as noted against each:-

S.#	Name	No	Place Of Posting	DD No.With date	Remarks	Order DPO
1.	FC Qasim	50/SPF	Police Lines	DD No.26, dt: 21.12.2018 to DD No.34, dt: 22.12.2018	11 Hours	Warning to be careful in future
2.	FC Jasim	522	Police Lines	DD No.26, dt: 21.12.2018 to DD No.34, dt: 22.12.2018	11 Hours	Warning to be careful in future
3.	FC Asghar Abbas	810	Police Lines	DD No.26, dt: 21.12.2018 to DD No.34, dt: 22.12.2018	11 Hours	Warning to be careful in future
4.	FC Inam Ullah	79	Police Lines	DD No.23, dt: 24.12.2018 to DD No.05, dt: 24.12.2018	01 Hours	Warning to be careful in future
5.	LHC Basit	958	Police Lines	DD No.23, dt: 17.12.2018 to DD No.33, dt: 18.12.2018	11 Hours	Warning to be careful in future
6.	FC Zohaib	14/SPF	Police Lines	DD No.26, dt: 21.12.2018 to DD No.25, dt: 25.12.2018	01 day	Absence period is treated as leave without Pay
7.	FC Naeem Shah	1262	Police Lines	DD No.12, dt: 15.12.2018 to DD No.37, dt: 18.12.2018	03 days	Absence period is treated as leave without Pay
8.	FC Adnan	674	Police Lines	DD No.23, dt: 14.12.2018 to DD No.05, dt: 17.12.2018	02 days	Absence period is treated as leave without Pay
9.	FC Imran	1394	Police Lines	DD No.24, dt: 14.12.2018 to DD No.42, dt: 20.12.2018	05 days	Absence period is treated as leave without Pay
10.	FC Sajid	95/SPF	Police Lines	DD No.26, dt: 21.12.2018 to DD No.25, dt: 22.12.2018	01 day	Absence period is treated as leave without Pay
11.	LHC Suliman	927 -	Police Lines	DD No.36, dt: 18.12.2018 to DD No.24, dt: 20.12.2018	02 day	Absence period is treated as leave without Pay
12.	FC Sajid	95/SPF	Police Lines	DD No.44, dt: 20.12.2018 to DD No.37, dt: 21.12.2018	01 day	Absence period is treated as leave without Pay
13.	FC Zohaib	14/SPF	Police Lines	DD No.44, dt: 20.12.2018 to DD No.37, dt: 21.12.2018	01 day	Absence period is treated as leave without Pay
14.	FC Ali Raza	26/SPF	Police Lines	DD No.44, dt: 20.12.2018 to DD No.37, dt: 21.12.2018	01 day	Absence period is treated as leave without Pay

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Amit Pale 0) No 2010 (2010) THE Advances Landson Co.

22 12 36 34 13) 2 07:20 cm 22, 8 l3 lo USP 1/10 34 1 810 ruel @ 300 per con 60001 ni 50 mb D 519 il w 9 436 or le pas 3 5126 - 21 18 1 100 26 MUSTON OF RE werd in Bosi Esconcerie VU US of Selection Con Child Reported 1 dois - 12 /1 - 1 20 100 2 My Slbs je por Jarded D-H-M 0 : 11: 20 NW orderl Sub Divisional Police Officen HQrs: Kohat 28-12-08

ir Konde aps che 21 12 36 mas 20 21/18 per La cielar cire/cliph 2 26 10 Public (1) 18 6 1 06 14 1 20:00 Chelled Sber Ille until is a felt co 552 POUNTS de l'Este Contra 2 l'élette 16 518 july 9 436 or 400 3 810 0 4 691 @ (me 674 Uhre 18 14 (wo of 8 50 pour 8 50 من سر والرب الع من طرف الرب الموالي الم Map a que 31 518, POSWas Dep 21-12-18 w

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KHYBER PAKHTUNKWA

SERVICE TRIBUNAL, PESHAWAR

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Dated: 30/09 /2021

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281 Fax:- 091-9213262

To

The District Police Officer,
Government of Khyber Pakhtunkhwa,
Kohat.

Subject:

JUDGMENT IN APPEAL NO. 1130/2019, MR. JASIM KHAN.

I am directed to forward herewith a certified copy of Judgement dated 14.09.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR