


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** 658/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/05/2024	<p>The appeal of Mr. Kashif Ahmad presented today by Mr. Taimur Ali Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 16.05.2024. Parcha Peshi given to the counsel for the appellant .</p> <p>By the order of Chairman</p> <p> <b>REGISTRAR</b></p>

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

**SERVICE APPEAL NO. 658 /2024**

Kashif Ahmad

V/S

Police Department

**APPLICATION FOR FIXING THE INSTANT  
APPEAL AT PRINCIPLE SEAT AT PESHAWAR.**

**RESPECTFULLY SHEWETH:**

1. That the appellant has filed the instant appeal in this Honorable Service Tribunal against the order dated 04.12.2023, whereby the appellant was dismissed from service, against the order dated 19.02.2024, whereby the departmental appeal of the appellant was rejected and against the order dated 07.05.2024, whereby the revision of the appellant was also rejected.
2. That instant appeal is in the jurisdiction of Camp Court Bannu of this Honorable Tribunal, but the appellant engaged counsel who is doing legal practice at Peshawar and the appellant also wants to peruse his case at principle seat at Peshawar.
3. That it will be convenient for the appellant as well as for his counsel if the instant appeal is fix at principle seat at Peshawar.

It is therefore most humbly prayed that on the acceptance of this application, the instant appeal may kindly be fixed at principle seat at Peshawar of this Honorable Tribunal.

THROUGH:

APPELLANT



**TAIMUR ALI KHAN  
ADVOCATE HIGH COURT**

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

SERVICE APPEAL NO. 658/2024

Kashif Ahmad

V/S


Police Department

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THROUGH:

APPELLANT

  
(TAIMUR ALI KHAN)  
ADVOCATE HIGH COURT  
03339390916

&

(SHAKIR ULLAH TORANI)  
ADVOCATE

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

SERVICE APPEAL NO. 658 /2024

Kashif Ahmad, Ex-FC No. 33,  
Special Branch Office Karak.

(APPELLANT)

VERSUS

1. The Provincial Police officer, Khyber Pakhtunkhwa, Peshawar.
2. The Additional Inspector General of Police, Special Branch Khyber Pakhtunkhwa Peshawar.
3. The Deputy Inspector General of Police, Special Branch Khyber Pakhtunkhwa Peshawar.

(RESPONDENTS)

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**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 04.12.2023, WHEREBY THE APPELLANT WAS DISMISSED FROM THE SERVICE AND AGAINST THE ORDER DATED 19.02.2024, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED FOR NO GOOD GROUNDS AND AGAINST THE ORDER DATED 07.05.2024, WHEREBY THE REVISION OF THE APPELLANT WAS ALSO REJECTED FOR NO GOOD GROUNDS.**

**PRAYER:**

**THAT ON THE ACCEPTANCE OF THIS APPEAL, THE IMPUGNED ORDERS DATED 04.12.2023, 19.02.2024 AND 07.05.2024 MAY PLEASE BE SET ASIDE AND THE APPELLANT MAY KINDLY BE REINSTATED INTO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.**

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**RESPECTFULLY SHEWETH:**

**FACTS:**

1. That the appellant was working in the respondent department as Constable and was performing his duty with devotion and honesty, whatsoever, assigned to him and no complaint has been filed by his superiors regarding his performance.
2. That the appellant was posted in Special Branch Office Karak (Beat Officer Police Station Karak) and while performing his duty in said capacity, verification of Zaffar Mehmood bearing CRC No.9785/CRC dated 26.07.2023 has been sent online from VB-II section to AGO Office Special Branch District Karak which was received on the same date and further endorsed to the appellant being Beat Officer of Police Station Karak. The appellant collected information about Zaffar Mehmood, there was nothing adverse against him on Special Branch record, Nawab Zada who is the Area Officer IB Karak also confirmed the good character of Zaffar Mehmood, then the appellant checked the record of the relevant police station about Zaffar Mehmood and found him clear, he also made secret queries about Zaffar Mehmood, but nothing adverse were found against him. The appellant after proper verification of Zaffar Mehmood handed over that verification to AGO Office Karak. **(Copy of verification proforma is attached as Annexure-A)**
3. That the appellant was suspended on 21.09.2023 and charge sheet along with the statement of allegations were issued to him in which the following allegation was leveled against the appellant that while posted at SB Office Karak have links with those personal who have links with criminals, especially with mastermind of MDCAT-2023 scan namely Zaffar Mehmood Khattak which show gross negligence in duty which brought this department in disrepute. The appellant submitted detail reply to the charge sheet and denied the allegations and clearly mentioned in his reply that as Beat Officer of Police Station Karak he collected information about Zaffar Mehmood, there was nothing adverse against him on Special Branch record, Nawab Zada Area Officer IB Karak also confirmed the good character of Zaffar Mehmood, checked his record of the relevant Police Station about him and found him clear, he also made secret queries about Zaffar Mehmood but nothing adverse were found against him and after proper verification of Zaffar Mehmood, he handed over that verification to AGO Office Karak and also mentioned in his reply that he has no link with the criminals and even he did not know Zaffar Mehmood. **(Copies of suspension order dated 21.09.2023, charge sheet along with statement of allegations and reply to charge sheet are attached as Annexure-B,C&D)**
4. That on the basis of above baseless allegation, inquiry was conducted against the appellant in which no opportunity of defence was provided

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to the appellant as neither statement were recorded in the presence of the appellant nor gave him opportunity of cross examination. The inquiry officer in his report mentioned the number registered against the CNIC of the appellant was obtained from CTD KP and similarly the cell numbers of Zaffar Mehmood was also received. CDR study concluded that no contact has been made during period (June 2023 to September 2023) and in this respect the inquiry officer also requested DPO Karak to examine the record of concerned Police Station and furnished information on which the DPO Karak submitted the report through memo dated 27.10.2023 in which it was clearly mentioned that as per record of Police Station City District Karak, Zaffar Mehmood is not involved in any criminal case and there is nothing adverse against him. Similarly, the record of Police Station was thoroughly checked/pursued regarding the mentioned FIRs against the above mentioned individual (zaffar Mehmood), but no investigation process in these have been communicated/incorporated with local Police Station City Karak, but despite that the inquiry officer recommended major punishment for the appellant. **(Copy of inquiry report is attached as Annexure-E)**

5. That final show cause notice was issued to the appellant, which was replied by the appellant in which he again denied the allegation and mentioned in his reply that no opportunity of defence was provided to him by the inquiry officer during inquiry proceeding and inquiry officer held him responsible on presumption basis and gave the same stance about the allegation in his reply to show cause notice as already given in his reply to charge sheet. **(Copies of show cause notice and reply to show cause notice are attached as Annexure-F&G)**
6. That on the basis of baseless allegations and without conducting proper inquiry to dig out the reality about the allegation, the appellant was dismissed from service vide order dated 04.12.2023. **(Copy of order dated 04.12.2023 is attached as Annexure-H)**
7. That the appellant filed departmental appeal against dismissal order dated 04.12.2023, which was rejected on 19.02.2024 for no good grounds. Then the appellant filed revision, which was also rejected on 07.05.2023 for no good grounds. **(Copies of departmental appeal, order dated 19.02.2024, revision and order dated 07.05.2024 are attached as Annexure-I,J,K&L)**
8. That the appellant has no other remedy except to file the instant appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

**GROUND:**

- A) That the orders dated 04.12.2023, 19.02.2024 and 07.05.2024 are against the law, rules, facts, norms of justice and material on record, therefore, not tenable and liable to be set aside.
- B) That no proper and regular inquiry was conducted against the appellant because no proper opportunity of defence was provided to the appellant as neither statements were recorded in the presence of the appellant nor gave him opportunity of cross examination, which is violation of law and rules and as such the impugned orders are liable to be set aside.
- C) That the inquiry officer mentioned in his report that the number registered against the CNIC of the appellant was obtained from CTD KP and similarly the cell numbers of Zaffar Mehmood was also received. CDR study concluded that no contact has been made during period (June 2023 to September 2023) and in this respect the inquiry officer also requested DPO Karak to examine the record of concerned Police Station and furnished information on which the DPO Karak submitted report through memo dated 27.10.2023 in which it was clearly mentioned that as per record of Police Station City District Karak, Zaffar Mehmood is not involved in any criminal case and there is nothing adverse against him. Similarly, the record of Police Station was thoroughly checked/pursued regarding the mentioned FIRs against the above mentioned individual (Zaffar Mehmood), but no investigation process in these have been communicated/incorporated with local Police Station City Karak, but despite that the inquiry officer recommended major punishment for the appellant and was dismissed from service on baseless allegations without any proof, which is against the norms of justice and fair play.
- D) That the inquiry officer also mentioned in his report that CDR of the appellant revealed that contact have been made him and Gul Salim ASI from SB/Hqr Peshawar on 27.07.2023, 30.07.2023 and 08.02.2023 (twice). These voice call might be regarding then in question matter and in finding of the report he mentioned that no direct contact has been found between the two (appellant and Zaffar Mehmood), however, contact has been observed between Gul Salim & Kashif Ahmad (appellant), but is necessary to mention here that Gul Salim is the father of the appellant who performing his duty as ASI in Special Branch Headquarter Peshawar, which shows that how inquiry was conducted against the appellant by the inquiry officer and on the basis of that inquiry proceeding, the inquiry officer recommended major punishment for the appellant.
- E) That the DPO Karak submitted the memo dated 27.10.2023 in which it was clearly mentioned that as per record of Police Station City District Karak, Zaffar Mehmood is not involved in any criminal case and there is nothing adverse against him on police station record. Moreover, record of Police Station was thoroughly checked/pursued

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regarding the mentioned FIRs in Police Station University Town Peshawar and Chakdara Dir Lower against the above mentioned individual (Zaffar Mehmood), but no investigation process in these have been communicated/incorporated with local Police Station City Karak. Similarly, MHC PS Karak also submitted report on 21.09.2023 that the record of Zaffar Mehmood has been checked and found clear which means that DPO Karak itself (which is the Head of District Police) and the concerned Police Station gave clear report about the verification of Zaffar Mehmood, then on what ground the appellant was penalized on verification report of Zaffar Mehmood. (Copies of memo dated 27.10.2023 and PS Karak report are attached as Annexure-M&N)

- F) That the allegation leveled against the appellant that he while posted at SB Office Karak have links with those personal who have links with criminals, especially with mastermind of MD.CAT-2023 scan namely Zaffar Mehmood Khattak which show gross negligence in duty which brought this department in disrepute, but it was not mentioned in the charge sheet that with whom the appellant have links who have links with criminal, however, the appellant denied that allegation and clearly mentioned in his reply that that he has no link with the criminals and even he did not know Zaffar Mehmood, but despite that he was dismissed from service which means that the appellant has been punished on presumption basis which is against the norms of justice and fair play.
- G) That the appellant clearly mentioned in his reply to charge sheet and show cause notice that when verification of Zaffar Mehmood bearing CRC No.9785/CRC dated 26.07.2023 endorsed to him. He collected information about Zaffar Mehmood, there was nothing adverse against him on Special Branch record, Nawab Zada who is the Area Officer IB Karak also confirmed the good character of Zaffar Mehmood, then the appellant checked the record of the relevant Police Station about Zaffar Mehmood and found him clear, he also made secret queries about Zaffar Mehmood but nothing adverse were found against him. The appellant after proper verification handed over the verification of Zaffar Mehmood to AGO Office Karak which shows that the appellant has conduct verification after collecting information and verifying from all the quarter concerned and did not conduct any misconduct, but despite that he was dismissed from service without any reason which means that the appellant has been punished for no fault on his part.
- H) That the name of Zaffar Mehmood was included in two FIRs filed in PS University Town, Peshawar, similarly the name of zaffar Mehmood was also included in another FIR filed in PS Chakdara Dir Lower, but no investigation process in these have, been communicated/incorporated with local Police Station City Karak due to which the appellant gave clear report about the verification of Zaffar Mehmood after obtaining information from the concerned




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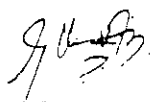
Police Station and as such the appellant should not be held responsible for the fault of the others and should not be punished for the fault of the others.

- I) That the appellant has denied the allegation in both his reply to charge sheet and show cause, but without observing reply of charge sheet and show cause and without conducting proper inquiry to dig out the reality about the allegation, the appellant was dismissed from service, which is against the law and rules and such the impugned orders are liable to be set aside.
- J) That the appellant has right of fair defence under Article-10-A, but no opportunity of proper defense was provided to the appellant, which is against the spirit of Article 10-A of the Constitution.
- K) That the appellant has been condemned unheard and has not been treated according to law and rules.
- L) That the appellant seeks permission of this Honorable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that on the acceptance of this appeal, the impugned orders dated 04.12.2023, 19.02.2024 and 07.05.2024 may please be set aside and the appellant may kindly be reinstated into service with all back and consequential benefits. Any other remedy which this Honorable Tribunal deems fit and appropriate that may also be awarded in favour of appellant.

  
APPELLANT  
Kashif Ahmad

THROUGH:

  
(TAIMUR ALI KHAN)  
ADVOCATE HIGH COURT  
&   
(SHAKIR ULLAH TORANI)  
ADVOCATE

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

SERVICE APPEAL NO. \_\_\_\_\_ /2024

Kashif Ahmad

VS

Police Department

AFFIDAVIT

I, Kashif Ahmad, Ex-FC No. 33, Special Branch Office Karak (Appellant), do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honorable Tribunal.

  
DEPONENT

A (8) Sent 31-07-23  
SERVICES VERIFICATION

1. GO/AGO No. 251-SB-KK (8) (A) VRC No. 9785-023  
 Dated: 22-02-23 Dated: 26-07-23

1. Full Name. ظفر محمد 2. CNIC. 14202-2484610-7  
 3. Contact No. 03119403223 4. Place of Birth. کراچی  
 5. Date of Birth. 10-01-1991 6. Domicile. کراچی  
 7. Father Name. مولانا احمد علی 8. Father CNIC. NIL  
 9. Husband/Wife Name. امینہ خان 10. Husband/Wife CNIC No. 14202-4124951-4  
 11. Permanent Address. گائون منشاوالہ تحصیل ضلع کراچی  
 12. Permanent P/S. کراچی 12. Present Address. ایلیہ  
 13. Present P/S. کراچی 14. District. کراچی  
 15. Caste/Tribe. ضلع 16. Education. BSc Engineering  
 17. Previous Profession. — 18. Political Affiliation. NIL  
 19. Nationality. پاکستان 20. Character. نیک  
 21. Criminal Record P/S. (If any) مقامی مقابلیہ ریکارڈ پر مذکورہ کے خلاف کوئی شکایت نہیں  
 22. Utility Bills if any (in the name of Applicant) NIL  
 23. Name of Land Lord if live in rented house. NIL  
 24. CNIC No/with Contact No. Land Lord. NIL  
 25. How long has Applicant residing in the house. NIL  
 26. Revenue Record.  
 (i). In his Name. دو کنال (ii). In his father name. NIL  
 27. Record of Government Services of Applicant family. If any شوگر کارخانہ درگاہ 1182  
 28. In case of Immigrant. ضلع اور کراچی  
 (i). Previous Nationality. پاکستان (ii). Citizen ship Certificate. NIL  
 29. Attestation  
 (i). Gazetted Officer/Nazim/Numberdar/CNIC/Seal 14202-98203847 **NAWAB ZADA**  
 Area Officer IB Karak  
 30. Remarks if any. نام ولایت سکولت درست کو لکھ بیان ہو کر عام شدت  
آج کل اور رہا۔ چلتا بیان ہو کر آج کل کا عدم تعلق کیوں سے وابستہ  
مافال بیان ہو کر۔ مقامی مقابلیہ ریکارڈ خاصہ سے  
 31. Name of Beat Officer. ماسٹر احمد 31. Signature. [Signature]  
 32. Name of AGO. جہانگیر خان 33. AGO Seal/ Signature. [Signature]

A.G.O Spectat.  
Branch Karak




OFFICE OF THE  
ADDITIONAL INSPECTOR GENERAL OF POLICE,  
SPECIAL BRANCH KHYBER PAKHTUNKHWA,  
PESHAWAR

Phone No.091-9218014  
Fax No.091-9218073

SUSPENSION ORDER

Constable Kashif Ahmad No.33 of this Establishment presently posted at SB Office Karak, is hereby suspended and closed to SB/Hqrs with immediate effect, due to his connection with criminals, negligence and lack of interest in disposing of official tasks.

  
Deputy Inspector General of Police  
Special Branch Khyber Pakhtunkhwa  
Peshawar

No. 9223-32 /EB, dated Peshawar the 21 / 09 / 2023

Copy to the: -

1. SP Security & SP Kohat Region/SB
2. DSP/HQrs/SB
3. PA to Addl. IGP & SSP/Admn:/SB
4. PA to DIG Security & Survey/SB
5. PA to DIG/SB
6. EA/SB
7. LO/SB
8. SB Office Karak

Annex A" (4)

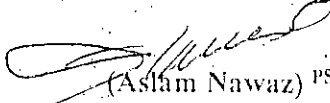
CHARGE SHEET

C

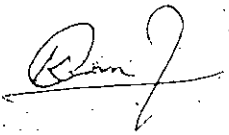
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I, Aslam Nawaz SSP/Admn., Special Branch, Khyber Pakhtunkhwa Peshawar, as a competent authority, under the Khyber Pakhtunkhwa Police Rules, 1975 (Amended 2014) hereby charge you Constable Kashif Ahmad No.33 as follows: -

- 2) You while posted at SB Office Karak (Beat Officer PS Khurram), have links with those personnel who have links with the Criminals, especially with the mastermind of MDCAT-2023 scam, namely Zaffar Mehmood Khattak which shows gross negligence in duty which brought this department in disrepute.
- 3) Your, this act amounts to gross misconduct and speaks highly adverse on your part warranting stern disciplinary action under the ibid Rules.
- 4) By reasons of the above, you appear to be guilty of misconduct and has rendered liable to all or any of the penalties specified under ibid Rules.
- 5) You are, therefore required to submit your written defense within Seven days of the receipt of this charge sheet to the Enquiry Committee/Enquiry Officer as the case may be.
- 6) Your written defense, if any, should reach the Enquiry Officer / Enquiry committee within the specified period, failing which it shall be presumed that you have no defense to put in and, in that case, an ex-parte action shall follow against you.
- 7) Intimate whether you desire to be heard in person.
- 8) A statement of allegations is enclosed.

  
(Aslam Nawaz) PSP  
Senior Superintendent of Police Admn:  
Special Branch Khyber Pakhtunkhwa,  
Peshawar.

Received



12-10-023


(8) (11)

DISCIPLINARY ACTION.

I, Aslam Nawaz SSP/Admn: Special Branch, Khyber Pakhtunkhwa Peshawar, am of the opinion that Constable Kashif Ahmad No.33, while posted to this Establishment rendered himself liable to be proceeded against departmentally, as he committed the following acts / omissions within the meaning of Khyber Pakhtunkhwa Police Rules 1975 (Amended 2014):

STATEMENT OF ALLEGATIONS

- 2) He while posted at SB Office Karak (Beat Officer PS Khurram), have links with those personnel who have links with the Criminals, especially with the mastermind of MDCAT-2023 scam, namely Zaffar Mehmood Khattak which shows gross negligence in duty which brought this department in disrepute.
- 3) This act amounts to gross misconduct and speaks highly adverse on his part warranting stern disciplinary action under the ibid Rules.
- 4) For the purpose of enquiry against the said accused officer with reference to the above allegation Mohammad Maroof Khan (SP Sr) is appointed as Enquiry Officer to conduct enquiry under the ibid rules.
- 5) The Enquiry Officer/Enquiry Committee shall in accordance with the provision of the said Rules, provide reasonable opportunity of hearing to the accused, conclude departmental proceeding within 30 days of the receipt of this order and submit findings whether he is guilty or otherwise.
- 6) The accused officer is directed to attend the proceedings on the date, time and place fixed by the Enquiry Officer.

  
(Aslam Nawaz) PSP  
Senior Superintendent of Police Admn:  
Special Branch Khyber Pakhtunkhwa,  
Peshawar.

No. 9915-16/EB: dated Peshawar the 12 - /10/2023

1. Enquiry Office with the direction to initiate departmental proceedings against the accused under the Rules and submit his findings in shortest possible time.
2. LO/SB to deliver upon the official concerned.

جناب عالی

مجاہد چارج سٹیٹ، بیان انزماں بذریعہ نمبر 9915-16/EB معروف ہیں۔ کہ یہ درجہ 4  
کہ جن ملزم بیٹ آفسر کو سبیل برائج میں لفتان تھا۔ اسی دوران ظفر محمود کو کل احقر  
(مردم) ساکن مرقا والا تحصیل، ضلع کرکٹی سرو میں ویر لیکیشن مجاہد سبیل برائج پید  
کواریئر نمبر 023-9785 موصول ہوئی۔ جن ملزم بیٹ آفسر نے ظفر محمود کے کوئی  
حاصل کر کے نواب زادہ ابراہیم آفسر کو 26.07.2023 کو ظفر محمود کے ٹیک چینی کی تصدیق کی۔ سبیل برائج  
ریکارڈ پر ظفر محمود کے خلاف بدچینی کی کوئی ثبوت موجود نہ تھی۔ جن ملزم بیٹ آفسر  
نے ظفر محمود کے سکون میں توانہ سے ریکارڈ دیکھ کر ظفر محمود عدم متنبہ اور عدم سزا یافتہ  
پایا گیا۔ اور بدچینی کا کوئی ثبوت نہ ملا۔ لہذا حسب ضابطہ کاروائی ویر لیکیشن  
نیز کاروائی کی خاطر جن بیٹ آفسر نے ظفر محمود کے بارے علاقہ میں حقیہ معلومات  
پہ برابر کر کے بدچینی کا کوئی ثبوت نہ ملا۔ ویر لیکیشن مجاہد چارج کرکٹی

جناب والا

ظفر محمود MD CAT خدمت میں ملوث پایا گیا۔ جن پر جن سائل کو معطل کیا گیا۔ جن  
کے مطابق جن ملزم بیٹ آفسر کا کمر سبیل کیا گیا اور خاص کر ظفر محمود کیا گیا

جناب عالی

جن ملزم بیٹ آفسر کا کہی گئی کمر سبیل کیا گیا کوئی رابطہ نہ ہے۔ نہ سزا ہے۔ جن  
ملزم بیٹ آفسر ملزمان کیا گیا کو رابطے کے انزام بابت ہر قسم صفائی کیلئے تیار ہوں۔  
میرے خلاف ہر قسم کی معلومات حاصل کی جا سکتی ہے۔

جناب عالی

مجاہد چارج سٹیٹ میں بیان کردہ انزماں کی تائید بابت جن ملزم بیٹ آفسر کے خلاف  
کیس فیس کی شیڈولڈ نہ ہو۔ مزید افسران بالا بہتر سمجھے ہیں۔

جناب عالی

جن ملزم بیٹ آفسر کے خلاف جملہ انزماں غلط فیسی پر مبنی ہے۔ جن ملزم  
جن ملزم بیٹ آفسر کا کمر سبیل کیا گیا اور ظفر محمود کیا گیا کوئی رابطہ نہ تھا ظفر محمود  
بیٹ آفسر کا نہیں جانتا ہوں۔ اور نہ ہی کسی شخص نے ظفر محمود کے خلاف بدچینی بابت  
کو مشعل سے نہیں جانتا ہوں۔ جن ملزم آفسر کے خلاف انزماں کا حقیقت سے دور کا واسطہ  
تک کسائی کی ہے۔ جملہ انزماں غلط اور بے بنیاد ہیں۔ لہذا مزید انزماں سے  
مذہم بالا امور اور حقائق کو مد نظر رکھ کر نوڈ بانہ انزماں سے  
جن ملزم بیٹ آفسر کو بہرہ الذمہ قرار فرمایا جاوے۔

کاشف احمد 33/ معطل، پید کواریئر نمبر 023-9785

ENQUIRY REPORT

AGAINST CONSTABLE KASHIF AHMAD NO. 33,  
AGO OFFICE KARAK, SPECIAL BRANCH

(13)

E

BACKGROUND:

Charge sheet along with summary of allegation served to Kashif Ahmad, FC AGO Office District Karak by SSP/Admin, Special Branch with the allegation that while posted as a Beat Officer, AGO SB Karak, has links with those personnel who have links with criminals, especially with the mastermind of MD-CAT 2023 scam, namely Zaffar Mehmood Khattak, which shows gross negligence in duty which brought this department in disrepute.

This act amounts to gross misconduct and speaks highly adverse on his part warranting stern disciplinary action against him under the rule of Khyber Pakhtunkhwa, Government Servants (efficiency and discipline), Charge sheet and summary of the allegation are attached as Annex-A.

Kashif Ahmad FC was suspended vide Order No. 9223-32/EB dated Peshawar 21/09/2023, attached as Annex-B. The undersigned was appointed as an enquiry officer to conduct enquiry under the ibid rules.

ENQUIRY PROCEEDINGS:

- Perusal of record at VB-II section reveals that the verification of Zaffar Mehmood bearing CRC No. 9785/GRC dated 26/07/2023 has been sent online from VB-II section to AGO Office SB, District Karak which was received on the same date and further endorsed to alleged official Constable Kashif Ahmad.
- Beat Officer, Kashif Ahmad submitted his report on the prescribed proforma of Special Branch to his AGO on 27/07/2023 vide Diary No. 251-SB-KK. The same was duly approved by SP concerned and sent back to SB/Hqrs VB-II section on 01/08/2023 online system.
- In response to the charge sheet, Kashif Ahmad submitted his written statement wherein he stated that he received the service verification of Zaffar Mehmood on 26/07/2023 and as a beat officer he collected information about Zaffar Mehmood while Nawab Zada area officer IB confirmed the Good character of Zaffar Mehmood. There was nothing adverse against him on Special Branch record, he added that he checked the record of the relevant police station about Zaffar Mehmood and found him clear. He also added that he made secret queries about Zaffar Mehmood but nothing adverse were found against him. Then he handed over the verification to Muharrar AGO Office Karak. He further added that later on Zaffar Mehmood was found involved in the MD-CAT scam and he (Kashif Ahmad) was suspended. He denied the allegation of contacts with any criminals. He further added that no evidence exists as per the allegation leveled in the charge sheet. During the cross-examination, the alleged official confessed that he did not meet Zaffar Mehmood neither he is known to him. Instead of Zaffar Mehmood one of his relative came for verification. At one point he confessed that he forgot that in how many days he made verification of Zaffar Mehmood. While another question he said that made verification in one day. This statement along with queries are attached as Annex-C. It is worth to mention that alleged Kashif Ahmad intentionally hid the fact that who gave him bio-data of Zaffar Mehmood.
- As per the allegation the number registered against the CNIC of Kashif Ahmad was obtained from CTD KP. The following numbers are registered against the CNIC of Kashif Ahmad.



(1)                      (2)                      (14)

Rank & Name	CNIC	Contact No
Constable Kashif Ahmad	14203-6239153-7	0310-9654183
		0343-5424552
		0340-9136611
		0348-9624544
		0331-9806242

Similarly, the cell numbers of Zaffar Mehmood was also received as under!

Name	CNIC	Contact No
Zafar Mehmood s/o Gul Akhtar	14202-2484610-7	0311-9403223
		0332-9078103
		0344-9340750
		0312-9340750
		0317-8522158

out of these numbers, the CDR of cell numbers 0311-9403223, 0332-9078103, and 0344-9340750 were received while the remaining 02 numbers have no CDR. CDR study concluded that no contact has been made during period (June 2023 to September 2023).

- CDR of alleged Kashif Ahmad revealed that contact have been made between him and Gul Salim ASI from SB/Hqrs Peshawar on 27/07/2023, 30/07/2023 and 08/02/2023 (twice). These voice calls might be regarding the in question matter.
- On the other hand on 27/07/2023 call has been made to Zaffar Mehmood from AGO Karak office. While two calls made on 31/07/2023 from AGO Karak office to Zaffar Mehmood. These calls are suspicious because on these dates verification was made & uploaded. CDR attached as Annex D.
- During the course of enquiry it has been learnt that the following cases has been registered against Zaffar Mehmood so-called mastermind of MD-CAT at Peshawar & Dir Lower.
  1. FIR No. 50 dated 27/07/2012 u/s 419/420 PPC PS University Town, Peshawar
  2. FIR No. 53 dated 24/07/2016 u/s 419-468-471-420-511 PPC 36/37 PS University Town, Peshawar
  3. FIR No. 76 dated 27/03/2022 u/s 419-420-468-471 PPC PS Chakdara Dir Lower. In Dir lower case Zaffar Mehmood was added in the column of accused during investigation and proceeding u/s 204 CrPC, 87 CrPC has been carried out and challan u/s 512 CrPC has been prepared.

In this regard, DPO Karak was requested to examine the record of concerned Police Station District Karak vide No. POI/LO/SB/844 dated 19/10/2023 and furnished information.

The reply of DPO Karak received vide No. 5097/PA dated 27/10/2023 is as!

*As per the record of Police Station City District Karak, Zaffar Mehmood is not involved in any criminal case and there is nothing adverse against him. Similarly, the record of the police station was thoroughly checked/perused regarding the mentioned FIRs against the above-named individual*

(8) (15) (3)  
Zafar Mehmood) but no investigation process in these cases have been communicated/incorporated with local Police Station City Karak."

Letter is placed as Annex-E.

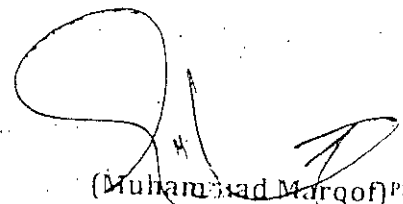
FINDINGS:

In the light of statements recorded, perusal of record & CDR. It was found that verification forms of verification of character/antecedent of Zafar Mehmood R/O Karak from FPSC Islamabad received to Central Registry SB (CRC) which was given No. 9786-CRC dated 26/07/2023 and forwarded to VB-II section. VB-II section forwarded this letter online to AGO District Karak without any enclosures (Forms of Verification). This verification was marked to alleged constable Kashif Ahmad on 26/07/2023 and he submitted his report after ground check and police station verification on 27/07/2023. Beat officer did not get any report of concerned Police Station about Zaffar Mehmood. The specialty of the verification (ground check) conducted by officials of Special Branch have a remarkable value and the beat officer did not make the proper ground check and verification with interest and logical way. He just pushed this verification ignorantly and brought himself accountable and disrepute of the department. He intentionally hid the fact that who provided the personal data of Zaffar Mehmood. He also hid the fact about Zaffar Mehmood resides out of district.

As far as links with criminals particularly with Zaffar Mehmood master mind of MD-CAT is concerned CDR (call data record) of Zaffar Mehmood was collected and no direct contact has been found between the two. However, contact has been observed between Gul Salim ASI & Kashif Ahmad, similarly AGO office with Zaffar Mehmood, this fact was hid by alleged officials. Nowadays most people are aware that the CDR is accessible and can be obtained as evidence, therefore people mostly use WhatsApp for this purpose. People like Zaffar Mehmood master mind of MD-CAT might use the same technique of communication. Moreover, the collection of record of WhatsApp is a very complicated process.

RECOMMENDATIONS:

Aforesaid discussion and perusal of record concludes that the alleged official Kashif Ahmad, Beat Officer SB Office AGO Karak is found of negligence and lack of interest in his official work for not conducting a proper ground check/verification of such a person (Zaffar Mehmood, master mind MD-CAT scam), who is involved in different cases and even proceedings under section 512 CrPC was carried out against him. During ground check he did not record any statement of notable/elders of the area. He also not collected written report of concerned Muharrar/SHQ. He also Intentionally hid the fact that who provided him the bio data of Zafar Mehmood. Which shows the incompetency and gross negligence and malafide attention of Kashif Ahmad. ~~The fact that major punishment for delinquent officials Kashif Ahmad in SB office is recommended. please~~



(Muhammad Marqoof) PSP  
Superintendent of Police, Survey Section  
Special Branch, Khyber Pakhtunkhwa,  
Peshawar

F 16

FINAL SHOW CAUSE NOTICE

I, Aftab Mehsud, Deputy Inspector General of Police Special Branch KP, Peshawar being competent authority under Khyber Pakhtunkhwa, Police Rules, 1975 (Amended 2014), issue this final show cause notice to you **VC Karim Ahmad No. 33** on the following grounds:-

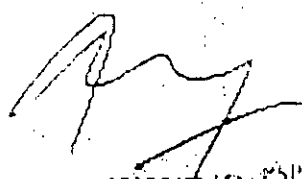
That, you while posted at SB office Karak (Beat Officer PS Khurram) have links with those personnel who have links with the criminals especially with the master mind MDCAIT-2023 scam namely Zafar Mehmood Khattak.

By the reason of the above, you appeared to be guilty of misconduct under the ibid rules therein and have rendered yourself to all or any of the penalties specified in the said rules.

As a result, thereof I, as competent authority, have tentatively decided to impose upon you the penalty of major punishment under Police Rule 1975.

You are therefore, required to Final Show Cause as to why the aforesaid penalty should not be imposed upon you, also intimate whether you desire to be heard in person.

If no reply to this notice is received within Seven (07) days of its delivery in the normal course of circumstances, it will be considered/presumed that you have no defense to put in and, in that case, an ex-parte action shall be taken against you.

  
(AFTAB MEHSUD) <sup>SP</sup>  
Deputy Inspector General of Police Special  
Branch Khyber Pakhtunkhwa  
Peshawar.

No. 62 /C&I Desk.

Dated Peshawar, the 22 / / 2023

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16

FINAL SHOW CAUSE NOTICE

I, Aftab Masood Deputy Inspector General of Police Special Branch KP Peshawar being competent authority Under Khyber Pakhtunkhwa Police Rules 1975 (amended 2014) issued this final show cause notice to you HC Kashif Ahmad No 33 on the following grounds:-

That you posted at SB office Karak (head Officer PS Khurram) have links with those personnel who have links with the criminal especially with the master mind MDCAT-2023 scam namely Zafar Mehmood Khattak.

By the reason of the above, your appeared to be guilty of misconduct under the ibid rules and have rendered yourself to all or any of the penalties specified in the said rules.

As a result, thereof as competent authority, have tentatively decided to impose upon you the penalty of major punishment under Police Rules 1975.

You are therefore, required to Final Show Cause Notice as to why the aforesaid penalty should not be imposed you, also intimate whether you desire to be heard in person.

If no reply to this notice is received with seven (7) days of its delivery in the normal course of circumstances, it will be considered/presumed that you have no defense to put in and, in that case, an ex-parte action shall taken against you.

(AFTAB HUSSAIN)

Deputy Inspector of Police Special  
Khyber Pakhtunkhwa Peshawar

جواب عالی  
 سوالہ فائل شوکار نوٹس No. 62/C & E Desh 22.11.2023  
 میں نے مطالعہ کر کے کہ آیا انکوٹری آفسر کے کہیں بنیاد پر قانون اور روٹری کے مطابق من ملزم سب آفسر کے خلاف سزا کی سفارش کی ہے۔ قانون، روٹری کے مطابق شوکار نوٹس کیس کیسے من ملزم سب آفسر کو انکوٹری نقل بھی دیا جائے گی۔ کیا کہیں انکوٹری آفسر کی روٹری کی روشنی میں اپنی دفاع کر سکے۔ مگر انکوٹری آفسر کی روٹری نقل من ملزم سب آفسر کو من ملزم سب آفسر کے خلاف جواب والا  
 س انکوٹری آفسر کے لیے من سب آفسر کے سامنے لینی تو وہ کا بیان رد قرار دینا ہے۔ جو من ملزم سب آفسر کے خلاف الزامات کی تائید میں صفحہ انکوٹری (نقل) پر لایا جا سکے۔ انکوٹری آفسر کے من میں آراء اور من ملزم سب آفسر کے من میں روٹری من میں من ملزم سب آفسر کو جرم قرار دینا۔ قانون، روٹری کے مطابق انکوٹری آفسر کا کام الزامات کی تائید میں سفارش جمع کرنا ہوتا ہے۔ اور من ملزم آفسر کو دفاع کا موقع فراہم کرنا ہوتا ہے۔ لیکن انکوٹری آفسر کے روٹری من میں من ملزم سب آفسر کے الزامات کو درست قرار دینے کی روٹری جمع کی ہے۔ حالات الزامات کی تائید میں من ملزم سب آفسر کے خلاف کیسی قسم کی روٹری سفارشات نہیں ہے۔

جواب والا  
 من ملزم سب آفسر کے سوالہ جاریہ ٹیٹ نمبری E-B/16-9915 کے جواب میں تفصیلاً دفاعی بیان انکوٹری آفسر کے سامنے جمع کی تھی۔ مگر انکوٹری آفسر من ملزم سب آفسر کا بیان بالکل نظر انداز کر رہا ہے۔ انکوٹری آفسر کے من میں بیان کی تردید میں کوئی سفارشات پیش نہ کی۔ من ملزم سب آفسر جاریہ ٹیٹ کے جواب میں واضح الفاظ میں ذیل دفاعی بیان انکوٹری آفسر کو پیش کی تھی۔ جو سبیل انکوٹری ہے۔

جواب عالی  
 سوالہ جاریہ ٹیٹ، بیان الزامات نمبری E-B/16-9915 کے من میں ہے۔ کہ یہ درست ہے کہ من ملزم سب آفسر نے کوئی سفارشات پیش نہ کی۔ اسی دوران ظفر محمود نے گل احشر حضور، ساکن ٹھکانہ والا قبیلہ، ضلع کرن کی سرورس ویئر ایڈیشن سوالہ سبیل برانچ ہیڈ کوارٹر شیٹ اور نمبر 9785-023 موصول ہوئی۔ من ملزم سب آفسر نے ظفر محمود کے وائف حاصل کر کے "لوٹ زیادہ" پر ماٹ آفسر B اکری نے ظفر محمود کے سبیل برانچ کے سفارشات کے خلاف بد چلی کی کوئی ثبوت موجود نہ تھی۔ من ملزم سب آفسر نے ظفر محمود کے سفارشات کی تائید میں روٹری کے خلاف بد چلی کی کوئی ثبوت موجود نہ تھی۔ من ملزم سب آفسر نے ظفر محمود کے سفارشات کی تائید میں روٹری کے خلاف بد چلی کی کوئی ثبوت موجود نہ تھی۔ من ملزم سب آفسر نے ظفر محمود کے سفارشات کی تائید میں روٹری کے خلاف بد چلی کی کوئی ثبوت نہ ملا۔ ویئر ایڈیشن سوالہ خنجر کی تھی۔

جواب عالی  
 ظفر محمود (CID CAT) من میں دلوت یا ایلا۔ جس پر من سبیل کو حوصلہ کہا گیا۔ جس کے مطابق من ملزم سب آفسر کا کوئی سفارشات اور خاص طور پر ظفر محمود کے سفارشات کے رابطے میں تھا۔  
 من ملزم سب آفسر کے کہیں کوئی سفارشات ہے۔ نہ رہا ہے۔ من ملزم سب آفسر کے سفارشات کے رابطے میں الزامات کی تائید میں سفارش جمع کرنا ہوتا ہے۔ اور من ملزم سب آفسر کو جرم قرار دینا۔ قانون، روٹری کے مطابق انکوٹری آفسر کا کام الزامات کی تائید میں سفارش جمع کرنا ہوتا ہے۔ اور من ملزم سب آفسر کو جرم قرار دینا۔ لیکن انکوٹری آفسر کے روٹری من میں من ملزم سب آفسر کے الزامات کو درست قرار دینے کی روٹری جمع کی ہے۔ حالات الزامات کی تائید میں من ملزم سب آفسر کے خلاف کیسی قسم کی روٹری سفارشات نہیں ہے۔



OFFICE OF THE  
ADDL. INSPECTOR GENERAL OF POLICE,  
SPECIAL BRANCH KHYBER PAKHTUNKHWA  
PESHAWAR

No. 102-08/C & E, Desk, Peshawar, the Dated, 04/12/2023

ORDER

This order will dispose off departmental enquiry against FC Kashif Ahmad of this establishment. The brief facts of the case are that, he while posted as SB Office Karak ( Beat Officer PS Khurram) have links with those personnel who have links with the criminals especially with the master mind of MDCAIT-2023 scam namely Zafar Mehmood Khattak.

Proper departmental proceedings under Khyber Pakhtunkhwa Police Rules 1975 (Amended 2014) were initiated by issuing charge sheet and statement of allegation vide No.9915-16/EB dated: 12-10-2023 against the alleged official wherein Mr. Muhammad Maroof (SP Survey) was appointed as enquiry officer.

The enquiry officer after conducting enquiry found FC Kashif Ahmad guilty and recommended "major punishment". He was also served with Final Show-Cause Notice and was heard in person.

Keeping in view the above, I Aftab Mehsud DIG Special Branch Khyber Pakhtunkhwa Peshawar being the competent authority under Ibid rules, hereby awarded the major punishment "dismissed from service" with immediate effect.

(Aftab Mehsud) PSP

Deputy Inspector General of Police  
Special Branch Khyber Pakhtunkhwa  
Peshawar.

Copy to the:-

1. PA to Addl. IG SB
2. DSP HQrs SB.
3. LO, SRC, EB & Official Concerned.

بخدمت جناب ایڈیشنل انسپکٹر جنرل آف پولیس،  
سوشل برانچ، خیبر پختونخوا پشاور۔

19

"اہل ہابت آرڈر نمبر C&Desk/102-08 مورخہ 04-12-2023 ہابت برخاستگی نوکری"

جناب عالی!

سائل حسب ذیل عرض رساں ہے۔

- ۱۔ یہ کہ سائل کا فیصلہ کاشف احمد نمبر 33، سوشل برانچ میں بطور SPO بھرتی ہوا تھا جو کہ بعد میں مورخہ 08-04-2020 کو ریگولر ہو گیا۔
  - ۲۔ یہ کہ سائل نے ایمانداری اور دل جوئی سے اپنی ڈیوٹی سرانجام دی ہے اور انسران بالا کو کبھی بھی شکایت کا موقع فراہم نہیں کیا۔
  - ۳۔ یہ کہ سائل نے بیٹ افسر کرک کی حیثیت سے ظفر محمود سکند کرک کی ماہ جولائی میں سرڈس ویریفیکیشن کی تھی لیکن اس وقت مذکورہ شخص ضلع کرک تھانہ کرک کے ریکارڈز پر مکمل طور پر کھینچا تھا۔ اس کے خلاف کسی قسم کی FIR وغیرہ نہیں تھی۔ سائل نے تھانہ کے ریکارڈز، گراؤنڈ چیک اور انسران بالا کی جانب سے مقرر کردہ پروفارمہ IB ایریا آفیسر کی تصدیق کے بعد کھینچا تھا۔ بعد میں مذکورہ شخص MDCAT سکیڈل میں ملوث پایا گیا۔ سائل کو اس بنیاد پر برخاست کیا گیا کیونکہ اس کا کھینچا ہوا شخص مستقبل میں جرم کا مرتکب ہوا کیونکہ کوئی بھی انسان کسی کے مستقبل کے ارادوں کو نہیں جان سکتا۔
  - ۴۔ یہ کہ من سائل کو اس بنیاد پر برخاست کیا گیا کہ اس کے MDCAT ماسٹر ماسٹڈ ظفر محمود کے ساتھ تعلقات تھے حالانکہ پوری انکوائری کے دوران میزے اور ظفر محمود کے تعلقات کے کوئی بھی ثبوت ثابت نہ ہو سکے۔ سائل ابھی بھی قرآن پاک پر حلف دینے کو تیار ہے کہ میں اس شخص کو نہ تو جانتا ہوں اور نہ ہی اس کے ساتھ کوئی روابط ہیں۔
  - ۵۔ یہ کہ سائل ایک غریب گھرانے سے تعلق رکھتا ہے۔ سائل تین بچوں کا باپ ہے اور اس منہنگائی کے دور میں اپنے اہل و عیال کی کفالت کرنا سائل کے لئے نہایت مشکل امر ہے۔
- لہذا بالا حالات و واقعات کی روشنی میں آپ جناب سے بذریعہ درخواست ہمدردانہ استدعا کی جاتی ہے کہ بمنظوری ڈپارٹمنٹل ایپل پینڈا حکم برخاستگی جاری کر دو ذی آئی جی، سوشل برانچ کو منسوخ فرماتے ہوئے من سائل کو باعزت طور پر نوکری پر بحال کرنے کے احکامات صادر فرمائے جا کر مکمل فرمایا جائے۔ سائل آپ کی لمبی عمر کیلئے تا عمر دعا گو رہے گا۔

العارض

کاشف احمد، FC/33، بیٹ آفیسر AGO کرک۔



OFFICE OF THE  
ADDL INSPECTOR GENERAL OF POLICE,  
SPECIAL BRANCH KHYBER PAKHTUNKHWA  
PESHAWAR

No. 140-1474C & E Desk, Peshawar, the Dated, 19/02/2024.

ORDER

This order is passed to dispose of departmental appeal preferred by Ex-Constable Kashif Ahmad No. 33 (BPS-07) under Khyber Pakhtunkhwa Police Rules 1975 (Amended 2014) against his dismissal from service. Facts forming the background of the departmental appeal are as follow.

That Ex-Constable Kashif Ahmad No. 33 (hereinafter referred as appellant) while posted at SB Office Karak (Beat Officer PS Khurram) has links with criminals especially with master mind of MDCAIT-2023 scam namely Zafar Mehmood Khattak.

Proper departmental proceedings were initiated against the appellant under Khyber Pakhtunkhwa Police Rules 1975 (Amended 2014) by issuing charge sheet and Statement of Allegations wherein Mr. Muhammad Maroof (the then SP Survey) was nominated to probe into the matter.

The enquiry officer accomplished enquiry and held the appellant guilty within the meaning of ibid rules. Hence, dismissed from service by the competent authority.

His appeal was perused in detail along with the record of enquiry proceedings by the undersigned but found unsatisfactory having no substance. Further, he was given an opportunity for hearing in person in orderly room but the appellant did not convince the undersigned. Therefore, the appeal of the appellant is rejected and filed in the light of his involvement in MDCAIT-2023 scam.

(Kashif Alam) <sup>PSP</sup>

Addl Inspector General of Police,  
Special Branch Khyber Pakhtunkhwa  
Peshawar.

Copy to the:-

1. PA to SSP/Admin SB
2. DSP HQrs SB.
3. LO, SRC, EB & Accountant SB.
4. Official Concerned.



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

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Subject: REVISION PETITION UNDER RULE 11-A OF POLICE  
RULES 1975 (AMMENDED 2014)

Respected Sir,

With due respect, petitioner submits revision petition against the order of Deputy Inspector General of Police, Special Branch dated 04-12-2023 vide which petitioner was dismissed from service and order of Additional IGP, Special Branch dated 19-02-2024 vide which departmental appeal of appellant was rejected.

Fact

1. That the appellant was serving as Constable at Special Branch and appellant verified service verification of one Zaffar Mehmood as a Beat Officer. Later on, the said Zaffar Mehmood was found involved in MDCAT 2023 scandal.
2. That the appellant was proceeded against departmentally and was dismissed from service vide order dated 04-12-2023 and the departmental appeal was also rejected vide impugned order, hence this revision petition on the following grounds.

Grounds

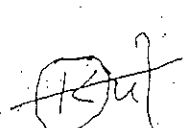
- a. That the service verification of Zaffar Mehmood was verified after examining the Police Station record and making open and secret enquiry. Nothing adverse was found on record, therefore, the verification was made bona-fidely.
- b. That as a human being petitioner was unable to judge the inner conduct of Zaffar Mehmood who was later on found involved in MDCAT 2023 scandal.

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- c. That ex-part enquiry was carried out as no evidence was conducted in support of the charge. No witness was examined in presence of petitioner. The entire proceedings were carried out at the back of petitioner. The impugned orders have been based on defective enquiry proceedings. The petitioner was not confronted with any evidence. Therefore, the impugned orders are void ab-initio.
- d. That the colleague officers were awarded minor punishment while major penalty of dismissal from service was imposed on the petitioner, therefore, the impugned orders are worth set aside.
- e. That the service verification was made in good faith and there is nothing on record that petitioner was having any link with the criminals.
- f. That the petitioner prior service record was unblemished and major penalty of dismissal from service was imposed on the petitioner on the basis of commission no misconduct or negligence in duty.
- g. That the petitioner belongs to a poor family and the loss of service amounts to award of punishment to the entire members of the family.
- h. That the petitioner would take to be heard in person.

It is, therefore, requested that the petitioner may be reinstated in service with back benefits.

Yours obediently.

 27 - 9 - 20  
[ Kashif Ahmed ]  
Ex-Constable No: 33,  
District Karak.



(23)

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
PESHAWAR.

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014), submitted by Ex-FC Kashif Ahmad No. 33. The applicant was dismissed from service by DIG Special Branch vide Order No. 102-08/C&I Desk, dated 04.12.2023, on the allegation that he while posted at SB Office, Karak (Beat Officer PS Khurram) has links with criminals especially with master mind of MDCAI-2023 scam namely Zafar Mehmood Khattak.

The Appellate Authority i.e. Addl. IGP Special Branch, rejected and filed his appeal vide Order Indst: No. 140-147/C&I Desk, Peshawar, dated 19.02.2024.

Meeting of Appellate Board was held on 02.05.2024 wherein petitioner was heard in person. The petitioner contended that the service verification of Zafar Mehmood was verified after examining the PS record and conducting open & secret enquiry. Nothing adverse was found on record.

Perusal of enquiry papers revealed that the allegations leveled against the petitioner has been proved. The petitioner failed to submit any cogent reason in his self-defense. The Board sees no ground and reasons for acceptance of his petition, therefore, his petition is hereby rejected.

Sd/-

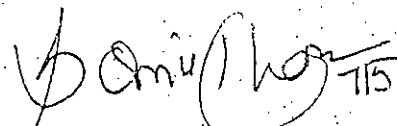
AWAL KHAN, PSP

Additional Inspector General of Police,  
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. S/ 937-942 /24, dated Peshawar, the 07-05-2024.

Copy of the above is forwarded to the:

1. Addl. Inspector General of Police, Special Branch KP Peshawar. Service Record (28 pages) and Enquiry File (44 pages) of the above named Ex-FC received vide your office Memo: No. 275/C&I Desk, dated 01.04.2024 is returned herewith for your office record.
2. Deputy Inspector General of Police, Special Branch.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl. IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. Office Supdt: B-IV CPO Peshawar.

  
(SONIA SHIAMROZE KHAN) PSP  
AIG/Establishment,  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

(38)

~~Amex~~  
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M

(24)



**OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KARAK**

Email: [dpokarak@yahoo.com](mailto:dpokarak@yahoo.com)  
Tel 0927-210724 - Fax 0927-210823

No. 5097/PA

-Dated: 27/10/2023

To: The Addl. Inspector General of Police,  
Special Branch Khyber Pakhtunkhwa,  
Peshawar

Subject: **PROVISION OF INFORMATION**

Memo: Kindly refer to your office Memo No. POI/LO/SB/844 dated  
19.10.2023 on the subject cited above.

It is submitted that as per report of Police Station City Karak that Zafar Mehmood s/o Gul Akhtar r/o Methawala Tehsil & District Karak is not involved in any criminal case and there is nothing adverse against him on police station record. Moreover, record of Police Station were also thoroughly checked/perused regarding the mentioned FIRs in Police Station University Town Peshawar and Chakdara Dir Lower against the above named individual, but no investigation process in these cases have been communicated/incorporated with local of Police Station City Karak, please.

  
DISTRICT POLICE OFFICER,  
KARAK

Scanned with CamScanner

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گل  
شماره محمود در برابر خسته در تمام کتب  
مؤلفان و نویسندگان در قلم کار

کتاب عالی  
شیرینال (در کتاب در تمام کتب  
در تمام سطلون یا بار کار

(در کتاب در تمام کتب خسته)

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۱۱۳-۱۱۲-۱۱۱  
۱۱۲-۱۱۱-۱۱۰

VAKALAT NAMA

(26)

NO. \_\_\_\_\_/2024

*Arbunad*

IN THE COURT OF Khyber Paktunkwa Service

Kashif Ahmael

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Police Deptt

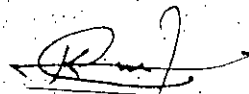
(Respondent)  
(Defendant)

I/we, Kashif Ahmael


Do hereby appoint and constitute TAIMUR ALI KHAN, ADVOCATE HIGH COURT AND SHAKIR ULLAH TORANI ADVOCATE, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

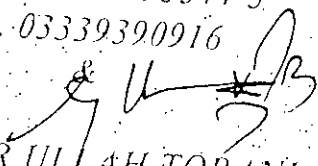
Dated \_\_\_\_\_/2024

  
(CLIENT)

ACCEPTED

  
TAIMUR ALI KHAN  
Advocate High Court

BC-10-4240  
CNIC: 17101-7395544-5  
Cell No. 03339390916

  
SHAKIR ULLAH TORANI  
Advocate Peshawar  
BC-22-4994