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

**Service Appeal No. 340/2024**

Abid Khan, Ex-IHC No. 203 Police Lines, Mardan

.....Appellant

**VERSUS**

The District Police Officer, Mardan and others.

.....Respondents

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**DSP Legal  
Mardan**

1

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

Khyber Pakhtunkhwa  
Service Tribunal

**Service Appeal No. 340/2024**

Abid Khan, Ex-IHC No. 203 Police Lines, Mardan

Diary No. 12501

Dated 2/5/24 Appellant

**VERSUS**

The District Police Officer, Mardan and others.

..... Respondents

**Para-wise comments on behalf of respondents No.01 & 02.**

**Respectfully Sheweth,**

**PRELIMINARY OBJECTIONS**

1. That the appellant has not approached this Hon'ble Tribunal with clean hands.
2. That the appellant has concealed the actual facts from this Hon'ble Tribunal.
3. That the appellant has got no cause of action or locus standi to file the instant appeal.
4. That the appellant is estopped by his own conduct to file the instant Service Appeal.
5. That the appeal is unjustifiable, baseless, false, flawless and vexatious and the same is liable to be dismissed with special compensatory cost in favour of respondents.
6. That the Hon'ble Tribunal has no jurisdiction to adjudicate the matter.
7. That the appeal is bad for miss joinder and non joinder of necessary parties.
8. That the appeal is barred by law and limitation.

**REPLY ON FACTS**

1. Para to the extent of enlistment and serving in Police Department of appellant pertains to record needs no comments. while rest of para is incorrect, because every Police Officer is under obligation to perform his duty upto the entire satisfaction of his superiors. Moreover, the perusal of service record of the appellant revealed that due to his lethargic attitude his entire service record is tainted with bad entries. Besides, non receipt of complaint against the appellant does not mean a clean chit for the future wrong deeds **(Copy of list of bad entries is attached as Annexure "A")**.
2. Incorrect. The appellant while posted as In-charge Police Post Shaheedan Police Station Rustam was found negligent for irregularities, as per SDPO Rural Mardan office letter No. 299/R dated 07.09.2021. As during routine patrolling on 01-09-2021, IHC Abid Khan No. 3293 & LHC Niaz Ali No.2697 etc of PP Shaheedan arrested Kamran r/o Nawan Killey Toru with a 30 bore without number and unlicensed pistol alongwith five rounds and a case FIR No.1057 dated 01-09-2021 U/S 15AA PS Rustam was registered against him.

On the next day IHC Abid Khan prepared a report for obtaining judicial remand and sent it to the Court through Constable Ayaz No.1663 with advice that the accused Kamran will be waiting at Mardan Katcheri. On reaching Mardan Katcheri, constable Ayaz found LHC Niaz Ali No. 2697 who was standing with accused Kamran, so constable Ayaz handed-over the report for obtaining judicial remand to LHC Niaz Ali. The accused was produced in the Court by LHC Niaz Ali wherein, the accused couldn't produce any surety so the Court fined him Rs.1000/-, but the accused did not pay the above mentioned fine due to which he was sent to judicial lock up. The main motive behind sending the accused to judicial lock-up was that on 03-09-2021 the brother of accused namely Amir Sajjad had to commit murder with the connivance of his brother and the delinquent official. Later on, a case vide FIR No.889 dated 03-09-2021 U/S 302/324/34 PPC PS Toru was registered in which the accused Kamran was also charged for the commission of offence.

It is worth mentioning that SP/Investigation Mardan vide his office letter No.531/PA/Inv: dated 06-09-2021 also highlighted the fact that accused Kamran in connivance with LHC Niaz Ali No. 2697, IHC Abid Khan and LHC Tariq Ali, malafidely got registered the above mentioned case so as to entitle the accused for plea of alibi in a murder case, because on the day and at the time of occurrence, accused Kamran was not present on the spot and no direct recovery has been made from him, while on next day accused Kamran was presented in court without handcuffs for remanding him to judicial lock up **(Copy of FIR is annexed as "B")**.

3. Correct to the extent that on account of aforementioned allegations, the appellant was issued charge sheet with statement of allegations vide No. 226/PA dated 01.10.2021. The enquiry was entrusted to Mr. Adnan Azam the then SDPO Sheikh Maltoon Mardan and the appellant submitted his reply but found unsatisfactory. Moreover, the enquiry officer during the course of enquiry provided full-fledged opportunity to the appellant to produce evidence/grounds in his defense, but he failed. However, after fulfillment of all legal and codal formalities, the Enquiry Officer recommended the appellant for Major Punishment.
4. Incorrect. Plea taken by the appellant is baseless, because he has been properly proceeded against departmentally by issuing him charge sheet with statement of allegations vide No. 226/PA dated 01.10.2021 and enquiry was entrusted to Mr. Adnan Azam the then SDPO Sheikh Maltoon Mardan. The enquiry officer during the course of enquiry provided full-fledged opportunity to the appellant to produce evidence/grounds in his defense, but he failed. However, after fulfillment of all legal and codal formalities, the Enquiry Officer recommended the appellant for Major Punishment. Therefore, the appellant was summoned and heard in Orderly Room on 02.02.2022, but he failed to present any plausible reason in his

defense, hence, he was served with a Final Show Cause Notice vide No. 1076-77/PA dated 07.12.2022, to which his reply was received and found un-satisfactory, besides, once again he was heard in Orderly Room on 09.03.2022, but this time too, the appellant failed to justify his innocence, therefore, he was awarded major punishment of dismissal from service, which does commensurate with the gravity of misconduct of the appellant **(Copies of Charge Sheet with Statement of allegations, Enquiry papers, Final Show Cause Notice and dismissal order are attached as annexure "C, D, E & F")**.

5. Correct to the extent that the appellant was issued Final Show Cause Notice vide No. 1076-77/PA dated 07.12.2022 to which his reply was received but found unsatisfactory.
6. Incorrect. Plea taken by the appellant is not plausible because he was dismissed on solid grounds. Moreover, the appellant preferred departmental appeal which was also decided on merit because the appellant was summoned & heard in Orderly Rooms on 31.03.2022 by providing full-fledged opportunity of defending himself before the appellate authority but he bitterly failed to produce any cogent reasons in his defense. Therefore, his departmental appeal was rejected and filed being devoid of any merit **(Copy of order are attached as Annexure "G")**.
7. Para pertains to filing of service appeal No. 620/2022 and its decision as well as issuing of directions for conducting denovo enquiry is correct needs no comments.
8. As per directions of this Honorable Tribunal the appellant was reinstated into service vide order dated 22.09.2023 for the purpose of de-novo enquiry and same was entrusted to Mr. Abdul Hayee, the then Principle EPTC Nowshera and fresh Charge Sheet with Statement of Allegations vide No. 8982/PA dated 10.10.2023 was issued to the appellant to which his reply was received but found unsatisfactory.
9. Incorrect. Stance taken by the appellant is baseless, because as per directions of this Honorable Tribunal the appellant was reinstated into service vide order dated 22.09.2023 for the purpose of de-novo enquiry by issuing him fresh Charge Sheet with statement of allegations vide No. 8982/PA dated 10.10.2023 and same was entrusted to Mr. Abdul Hayee, the then Principle EPTC Nowshera, during the course of enquiry statements of all concerned were recorded and all concerned were as well as the appellant were questioned and cross questioned at length by providing full-fledged opportunity to the appellant to produce evidence/grounds in his defense, but he failed. However, after fulfillment of all legal and codal formalities, the Enquiry Officer recommended to be intact the same punishment i.e major punishment of dismissal from service. In light of above, the appellant was issued fresh Final Show Cause Notice vide No. 9293/PA dated 19.10.2023 to which his reply was

received but found unsatisfactory, therefore, the appellant was summoned and heard in Orderly Room on 16.11.2023, but this time too, he bitterly failed to present any plausible reason in his defense, hence, he was awarded major punishment of dismissal from service with effect from 09.03.2022, which does commensurate with the gravity of misconduct of the appellant **(Copies of fresh charge sheet with statement of allegations, De-novo enquiry papers, fresh Final Show Cause Notice and dismissal order are attached as Annexure "H, I, J & K")**.

10. Correct to the extent that the appellant was issued fresh Final Show Cause Notice vide No. 9293/PA dated 19.10.2023 to which his reply was received but found unsatisfactory.
11. Incorrect. Plea taken by the appellant is baseless, because he has been properly proceeded through De-novo enquiry by issuing him fresh charge sheet with statement of allegations vide No. 8982/PA dated 10.10.2023 and enquiry was entrusted to Mr. Abdul Hayee, the then Principle EPTC Nowshera, during the course of enquiry statements of all concerned were recorded and all concerned were as well as the appellant were questioned and cross questioned at length by providing full-fledged opportunity to the appellant to produce evidence/grounds in his defense, but he failed. However, after fulfillment of all legal and codal formalities, the Enquiry Officer recommended to be intact the same punishment i.e major punishment of dismissal from service. In light of above, the appellant was issued fresh Final Show Cause Notice vide No. 9293/PA dated 19.10.2023 to which his reply was received but found unsatisfactory, therefore, the appellant was summoned and heard in Orderly Room on 16.11.2023, but this time too, he bitterly failed to present any plausible reason in his defense, hence, he was awarded major punishment of dismissal from service with effect from 09.03.2022, which does commensurate with the gravity of misconduct of the appellant. Then the appellant preferred department appeal which was also decided on merit because the appellant was summoned & heard in Orderly Rooms on 24.01.2024 by providing full-fledged opportunity of defending himself before the appellate authority but he bitterly failed to produce any cogent reasons in his defense. Therefore, his departmental appeal was rejected and filed being devoid of merit **(Copy of rejection order is attached as annexure-L)**
12. That appeal of the appellant is liable to be dismissed on the following grounds amongst the others.

**REPLY ON GROUNDS:**

- A. Incorrect. Orders passed by the competent as well as appellate authorities are according to law, facts and norms of natural justice, hence, liable to be maintained.
- B. Incorrect. Plea taken by the appellant is baseless, because he has been properly proceeded through De-novo enquiry by issuing him fresh charge

sheet with statement of allegations vide No. 8982/PA dated 10.10.2023 and enquiry was entrusted to Mr. Abdul Hayee, the then Principle EPTC Nowshera, during the course of enquiry statements of all concerned were recorded and all concerned as well as the appellant were questioned and cross questioned at length by providing full-fledged opportunity to the appellant to produce evidence/grounds in his defense, but he failed. However, after fulfillment of all legal and codal formalities, the Enquiry Officer recommended to be intact the same punishment i.e major punishment of dismissal from service. In light of above, the appellant was issued fresh Final Show Cause Notice vide No. 9293/PA dated 19.10.2023 to which his reply was received but found unsatisfactory, therefore, the appellant was summoned and heard in Orderly Room on 16.11.2023, but this time too, he bitterly failed to present any plausible reason in his defense, hence, he was awarded major punishment of dismissal from service with effect from 09.03.2022, which does commensurate with the gravity of misconduct of the appellant.

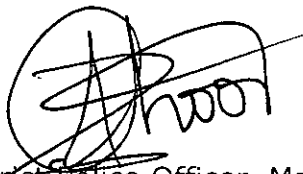
- C. Incorrect. Stance taken by the appellant is baseless, because as per directions of this Honorable Tribunal the appellant was reinstated into service vide order dated 22.09.2023 for the purpose of de-novo enquiry by issuing him fresh Charge Sheet with statement of allegations vide No. 8982/PA dated 10.10.2023 and same was entrusted to Mr. Abdul Hayee, the then Principle EPTC Nowshera, during the course of enquiry statements of all concerned were recorded and all concerned as well as the appellant were questioned and cross questioned at length by providing full-fledged opportunity to the appellant to produce evidence/grounds in his defense, but he failed. However, after fulfillment of all legal and codal formalities, the Enquiry Officer recommended to be intact the same punishment i.e major punishment of dismissal from service. In light of above, the appellant was issued fresh Final Show Cause Notice vide No. 9293/PA dated 19.10.2023 to which his reply was received but found unsatisfactory, therefore, the appellant was summoned and heard in Orderly Room on 16.11.2023, but this time too, he bitterly failed to present any plausible reason in his defense, hence, he was awarded major punishment of dismissal from service with effect from 09.03.2022, which does commensurate with the gravity of misconduct of the appellant.
- D. Incorrect. Stance taken by the appellant is not plausible, the enquiry proceedings has conducted as per rules, as the appellant has tailored the instant concocted story just to save his skin.
- E. Incorrect. Plea taken by the appellant is not plausible because he has submitted replies to the Charge Sheet and Final Show Cause Notice, which were found unsatisfactory. As the appellant has tailored the instant concocted story just to save his skin. Moreover, the enquiry officer during the course of enquiry statements of all concerned were recorded and all

concerned as well as the appellant were questioned and cross questioned at length by providing full-fledged opportunity to the appellant to produce evidence/grounds in his defense, but he failed. However, after fulfillment of all legal and codal formalities, the Enquiry Officer recommended to be intact the same punishment i.e major punishment of dismissal from service. In light of above, the appellant was issued fresh Final Show Cause Notice vide No. 9293/PA dated 19.10.2023 to which his reply was received but found unsatisfactory, therefore, the appellant was summoned and heard in Orderly Room on 16.11.2023, but this time too, he bitterly failed to present any plausible reason in his defense, hence, he was awarded major punishment of dismissal from service with effect from 09.03.2022, which does commensurate with the gravity of misconduct of the appellant.

- F. Incorrect. The enquiry officer after fulfillment of all legal and codal formalities, just recommended the appellant for Major Punishment. Later on Final Show Cause was also issued to the appellant, to which his reply was received, but found unsatisfactory, which is tenable under the law.
- G. Incorrect. Para already explained needs no comments.
- H. Incorrect. Stance taken by the appellant is baseless because he has been treated according to law and rules.
- I. The respondents also seek permission of this honorable tribunal to adduce additional grounds at the time of arguments.

**PRAYER:-**

Keeping in view the above stated facts and rules it is most humbly prayed that the appeal of the appellant being devoid of merit may kindly be dismissed with costs please.



District Police Officer, Mardan.  
(Respondent No. 2)  
**(ZAHOOR BABAR)<sup>PSP</sup>**  
Incumbent



Regional Police Officer, Mardan.  
(Respondent No. 1)  
**NAJEEB-UR-REHMAN BUGVI)<sup>PSP</sup>**  
Incumbent

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

**Service Appeal No. 340/2024**

Abid Khan, Ex-IHC No. 203 Police Lines, Mardan

.....Appellant

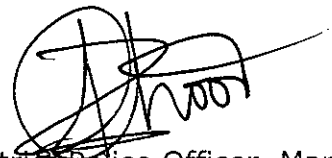
**VERSUS**

The District Police Officer, Mardan and others.

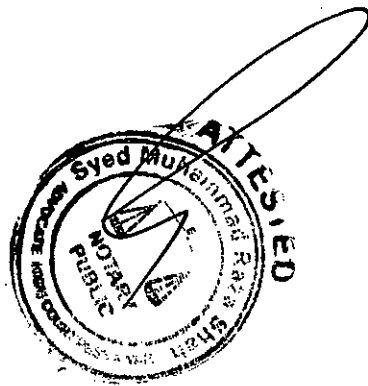
.....Respondents

**COUNTER AFFIDAVIT.**

I, the respondent do hereby declare and solemnly affirm on oath that the contents of the Para-wise comments in the service appeal cited as subject are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal. It is further stated on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defense has been struck off.



District Police Officer, Mardan.  
(Respondent No. 2)  
**(ZAHOOR BABAR)<sup>PSP</sup>**  
Incumbent



02 MAY 2024



# Annexure A


8

OFFICE SECRETARY GENERAL ELITE FORCE  
RHT

## 15-CENSURES AND PUNISHMENTS:


Punishment ~~and~~ one day Quarter Guard for  
best Turnout on the General Parade

No. 2868  
18/12/09

  
DPO/MR


Punishment ~~and~~ one day Quarter Guard

No. 4182  
1-10-10

  
DPO/Mardan

Granted CC-~~II~~ II, by Addl: IG Elite  
SEKPK for his good performance.


No. 607  
18-12-07

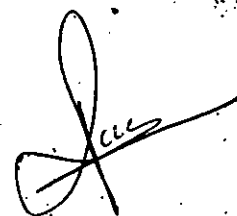
  
DPO/Mardan

Passed intermediate college course  
in the term ending 20-03-19

ide. Commandant PTC Haripur  
Notification NO. 1835/5 dt 24-9-19

No. 2093  
2-10-19

  
DPO/Mardan



CHARACTER ROLL OF

IO

(Continued)

Serial No.

15-CENSURES AND PUNISHMENTS-Contd.

Name Disburt on Promotion list of 20-08-19 vide DIS/MP NORTH NO.14551-55/19  
 Lt 27-12-19  
 OB NO. 2780  
 30-12-19  
 DPO/MARDAN

ORDER

He is hereby placed under suspension and closed to Police Line Mardan.

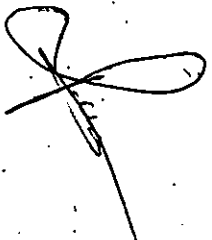
With immediate effect.



DPO/MARDAN

OB NO = 1506

Dated = 06.09.2021



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Serial No.

Page No. \_\_\_\_\_

OFFICE SUPERINTENDENT (General)  
KHYBER PAKHTUNKHWA

15-CENSURES AND PUNISHMENTS.—Contd.

all  
/ised

of Police  
wa Peshawar

ORDER


Awarded him Major punishment of dismissal from  
service with immediate effect in exercise of  
The power vested in me under Police Rules-1975

QB NO. 633  
Dated: 09-03-2022

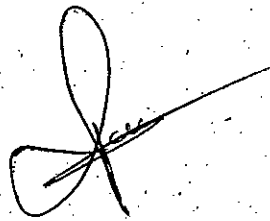
  
District Police Officer  
Mardan

ORDER

the Appeal Rejected and failed  
vide DIG Mardan office order  
NO 2769/ES Date: 5-04-2022

  
(JEHANZEB KHAN) DSP  
Deputy Commandant  
Force, Khyber Pakhtunkhwa P

DPO/MRAD



16. LEAVE, ABSENCE AND BREAKS IN SERVICE.

OFFICE SUPERINTENDENT ELITE FORCE  
KHYBER PAKHTUNKHWA

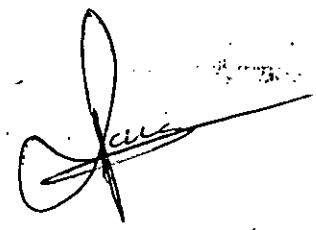
All periods not counting as "approved service" to be entered in red ink.

1		2			3	4
DATE		EXTENT			No. of District Order	Description of leave i. e. privilege, hospital, sick leave, or furlough or of absence, or forfeiture of approved service. All entries to be initialed, by Superintendent of Police.
From	To	Years	Months	Days		
17/08	to 6/12/08			(6)	2761 26/12/08	Leave w/o pay DP/SMR
				(1)	1477 3-5-10	do DP/SMR
				(1)	3200 25-8-10	do DP/SMR
				(1)	3819 29-9-10	do DP/SMR
				(1)	4150 27-1-10	do DP/SMR
				(1)	4226 29-1-10	do DP/SMR
				(20)	4238 1-11-10	E/Leave DP/SMR

15 Days Ex-Pakistan Leave for "LMRA" 1380-86/FF

25-3-2016

BY: COMMANDANT,  
ELITE FORCE  
Khyber Pakhtunkhwa, Peshawar.



Annexure "B" 12

ابتدائی اطلاع کرو۔  
ابتدائی اطلاع سے قبل ریسٹ اسٹیشن سے اطلاع دی جائے۔

37	105	37
15:30	15:40	15:30
جائے وقوعہ پر پہنچنے کا وقت	جائے وقوعہ پر پہنچنے کا وقت	جائے وقوعہ پر پہنچنے کا وقت
ASJ	ASJ	ASJ
30 جون 1991	30 جون 1991	30 جون 1991
15A/A	15A/A	15A/A
پولیس اسٹیشن پر پہنچنے کا وقت	پولیس اسٹیشن پر پہنچنے کا وقت	پولیس اسٹیشن پر پہنچنے کا وقت
16101-0702528-1	16101-0702528-1	16101-0702528-1
0333-9655510	0333-9655510	0333-9655510
کارروائی کی تاریخ	کارروائی کی تاریخ	کارروائی کی تاریخ
پولیس اسٹیشن پر پہنچنے کا وقت	پولیس اسٹیشن پر پہنچنے کا وقت	پولیس اسٹیشن پر پہنچنے کا وقت

ابتدائی اطلاع کے درجے کرو۔ ویڈیو کے ذریعے قبضہ کیا گیا۔  
 پلاننگ کے دوران پولیس اسٹیشن پر پہنچنے کا وقت 15:40 بجے تھا۔  
 پولیس اسٹیشن پر پہنچنے کے وقت پولیس اسٹیشن پر پہنچنے کا وقت 15:30 بجے تھا۔  
 پولیس اسٹیشن پر پہنچنے کے وقت پولیس اسٹیشن پر پہنچنے کا وقت 15:30 بجے تھا۔

پولیس اسٹیشن پر پہنچنے کا وقت  
 15/6/91

پولیس اسٹیشن پر پہنچنے کا وقت  
 15/6/91

مجلس اعلیٰ ہندوستان کی اجلاس کے فیصلے

۱۰۰۰۰۰

۱۰۰۰۰۰

۱۰۰۰۰۰

تاریخ اجلاس	موضوع	مقررہ وقت
۱۰-۴-۱۹۵۷	قانون تجارت (۱۹۵۷ء) کے متعلق	۱۱:۳۰ بجے
۱۰-۴-۱۹۵۷	قانون تجارت (۱۹۵۷ء) کے متعلق	۱۱:۳۰ بجے
۱۰-۴-۱۹۵۷	قانون تجارت (۱۹۵۷ء) کے متعلق	۱۱:۳۰ بجے
۱۰-۴-۱۹۵۷	قانون تجارت (۱۹۵۷ء) کے متعلق	۱۱:۳۰ بجے
۱۰-۴-۱۹۵۷	قانون تجارت (۱۹۵۷ء) کے متعلق	۱۱:۳۰ بجے
۱۰-۴-۱۹۵۷	قانون تجارت (۱۹۵۷ء) کے متعلق	۱۱:۳۰ بجے
۱۰-۴-۱۹۵۷	قانون تجارت (۱۹۵۷ء) کے متعلق	۱۱:۳۰ بجے
۱۰-۴-۱۹۵۷	قانون تجارت (۱۹۵۷ء) کے متعلق	۱۱:۳۰ بجے

مجلس اعلیٰ ہندوستان کی اجلاس کے فیصلے اور اس کے متعلق ہندوستان کے ہر شہری کو مطلع کرنے کے لئے یہ اطلاع دی جا رہی ہے۔

مجلس اعلیٰ ہندوستان نے ۱۰-۴-۱۹۵۷ء کو ایک قرارداد منظور کی اور اس کے تحت ہندوستان کے ہر شہری کو مطلع کرنے کے لئے ایک اطلاع دی جا رہی ہے۔

مجلس اعلیٰ ہندوستان نے ۱۰-۴-۱۹۵۷ء کو ایک قرارداد منظور کی اور اس کے تحت ہندوستان کے ہر شہری کو مطلع کرنے کے لئے ایک اطلاع دی جا رہی ہے۔

مجلس اعلیٰ ہندوستان نے ۱۰-۴-۱۹۵۷ء کو ایک قرارداد منظور کی اور اس کے تحت ہندوستان کے ہر شہری کو مطلع کرنے کے لئے ایک اطلاع دی جا رہی ہے۔

مجلس اعلیٰ ہندوستان نے ۱۰-۴-۱۹۵۷ء کو ایک قرارداد منظور کی اور اس کے تحت ہندوستان کے ہر شہری کو مطلع کرنے کے لئے ایک اطلاع دی جا رہی ہے۔

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مجلس اعلیٰ ہندوستان نے ۱۰-۴-۱۹۵۷ء کو ایک قرارداد منظور کی اور اس کے تحت ہندوستان کے ہر شہری کو مطلع کرنے کے لئے ایک اطلاع دی جا رہی ہے۔

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OFFICE OF THE DEPUTY SUPERINTENDENT OF POLICE,  
RURAL CIRCLE, MARDAN.

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Phone: 0937-580322 E-mail: dsp.ruralmdn@gmail.com

To: The Worthy, District Police Officer,  
Mardan.

No. 1299 /R

Dated: 7/9 /2021

Subject: REQUEST FOR DEPARTMENTAL PROCEEDINGS

Respected Sir,

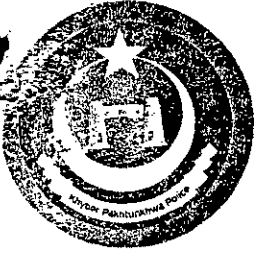
It is submitted that on dated 01-09-2021 IHC Abid Khan I/C PP Shaheedan Rustam was on routine patrolling along with LHC Niaz Ali No. 2697 and other Police party meanwhile they stopped a person namely Kamran s/o Noor Habib R/O Nawan Kalli Toru on suspicion, during body search a pistol 30 bore without Number and unlicensed along with 05 rounds were recovered from him. IHC Abid Khan prepared Murasila and sent it to the PS by hand of LHC Niaz Ali wherein proper case FIR No.1057 dated 01-09-2021 U/S 15AA PS Rustam was registered against the said person. After registering FIR copy of FIR was sent to the said IHC for investigation.

On dated 02-09-2021 IHC Abid Khan prepared Remand Judicial Challan and sent it to the court by hand of Constable Ayaz No.1663 with the advice that the accused is waiting at Mardan Kachehri. On arrival to Mardan Kachehri he found LHC Niaz Ali NO. 2697 along with the accused Kamran so he handed-over the Remand Judicial papers to LHC Niaz Ali who presented the accused to the court wherein the accused couldn't produce any surety, so the worthy court fined him Rs. 1000/- but **intentionally** the accused regretted that he cannot pay the fined amount, in-consequences he was sent to judicial lock-up Mardan. The main Purpose behind preferring Judicial lock-up was that on dated 03-09-2021 brother of the accused namely Ameer Sajjad committed murder wherein a case FIR No.889 dated 03-09-2021 u/s 302-324-34 PPC PS Turo was registered, the said accused (Kamran) was also charged in said FIR for commission of the offence but he was sent to Judicial lock-up Mardan on dated 02-09-2021.

The whole scene was created and planed which creates a doubt that the Police officials IHC Abid Khan No. 3293 I/C PP Shaheedan, LHC Niaz Ali No.2697, FC Ayaz No. 1663 seem to involved in this planning who managed the accused to reach to the Judicial Lock-up so that he may not get charged in the FIR No.889 dated 03-09-2021 u/s 302-324-34 PPC PS Turo. Therefore it is requested that departmental proceedings may be taken against the mentioned Police officials to rectify the real facts of the whole story, please.

*IHC Abid Khan*  
*PA*  
*Put it in their file. The officers have already been suspended.*  
*8.9.2021*

Deputy Superintendent of Police,  
Rural Circle, Mardan.



Annexure C-11  
② 15/1

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

Tel No. 0937-9230109 & Fax No. 0937-9230111  
Email: dpomdn@gmail.com

2021

No. 226 /PA

Dated 07/10/2021

**DISCIPLINARY ACTION**

I, Dr. Zahid Ullah (PSP), District Police Officer Mardan as competent authority am of the opinion that IHC Abid Khan No.3293, himself liable to be proceeded against, as he committed the following acts/omissions within the meaning of Police Rules, 1975:

**STATEMENT OF ALLEGATIONS**

Whereas, IHC Abid Khan No.3293, while posted as In-charge P.P Shaheedan (now under suspension Police Lines Mardan) was found negligence for the following irregularities, as per SDPO Rural Mardan office letter No.1299/R dated 07-09-2021:-

- 1) On 01-09-2021, he accompanied by LHC Niaz Ali No.2697 etc arrested one Kamran r/o Nawan Kille Toru with a (30) bore without number and unlicensed pistol & (05) rounds during routine patrolling vide case FIR No.1057 dated 01-09-2021 U/S 15AA PS Rustam.
- 2) On 02-09-2021, he (IHC Abid Khan) has prepared Remand Judicial Challan and sent it to the Court through Constable Ayaz No.1663 with advice that the accused is waiting at Mardan Katcheri. On reaching Mardan Katcheri, he found LHC Niaz Ali No. 2697 along-with accused Kamran, so he handed-over the Remand Judicial papers to LHC Niaz Ali, who produced the accused to the Court wherein the accused couldn't produce any surety, so the Court fined him of Rs.1000/-, but intentionally the accused regretted by not paying the fined amount, so he was sent to Judicial Lock-up. The main purpose behind preferring Judicial Lock-up was that on 03-09-2021, brother of accused namely Atta Sajjad committed murder vide case FIR No.889 dated 03-09-2021 U/S 302/324/34 PPC PS Toru, in which, he (accused Kamran) was also charged for the commission of crime.
- 3) As per SP/Investigation Mardan vide his office letter No.531/PA/Inv: dated 06-09-2021, highlighting that accused Kamran in connivance with LHC Muhammad Tariq No.627 of PAL Office Mardan and his brother LHC Niaz Ali No. 2697 of PP Shaheedan (Now both suspended) registered the above quoted case against himself, because on the day and at the time of occurrence, accused Kamran was not present on the spot and no direct recovery has been made from him, while on the next day (02-09-2021), accused Kamran was handed-over to Constable Ayaz Ali No.1663 without handcuffs in the Court, wherein before the concerned Magistrate, accused Kamran resiled from his statement and was sent to Judicial Lockup Mardan. From the preliminary enquiry, it has been found that accused Kamran in connivance with LHC Muhammad Tariq has planned his entrance to Mardan Jail and this fact has been accepted by all.
- 4) From the above discussion, the involvement of IHC Abid Khan in this episode/plan can't be ruled-out.

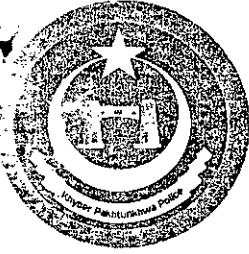
For the purpose of scrutinizing the conduct of the said accused official with reference to the above allegations, Mr. Adnan Azam SDPO SMT is nominated as Enquiry Officer.

The Enquiry Officer shall, in accordance with the provision of Police Rules 1975. provides reasonable opportunity of hearing to the accused Police Officer, record/submit his findings and make within (30) days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused Official.

IHC Abid Khan is directed to appear before the Enquiry Officer on the date & time and place fixed by the Enquiry Officer.

(Dr. Zahid Ullah) PSP  
District Police Officer  
Mardan





OFFICE OF THE  
DISTRICT POLICE OFFICER,  
MARDAN

Tel No. 0937-9230109 & Fax No. 0937-9230111  
Email: dpomdn@gmail.com

2021

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CHARGE SHEET

I, Dr. Zahid Ullah (PSP), District Police Officer Mardan, as competent authority, hereby charge IHC Abid Khan No.3293, while posted as In-charge P.P Shaheedan (now under suspension Police Lines Mardan), as per attached Statement of Allegations.

1. By reasons of above, you appear to be guilty of misconduct under Police Rules, 1975 and have rendered yourself liable to all or any of the penalties specified in Police Rules, 1975.
2. You are, therefore, required to submit your written defense within 07 days of the receipt of this Charge Sheet to the Enquiry Officer, as the case may be.
3. Your written defense, if any, should reach the Enquiry Officers within the specified period, failing which, it shall be presumed that you have no defense to put-in and in that case, ex-parte action shall follow against you.
4. Intimate whether you desired to be heard in person.

(Dr. Zahid Ullah) PSP  
District Police Officer  
Mardan

Dr. Zahid Ullah  
District Police Officer  
Mardan

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جناب عالی:-

بحوالہ ڈسپینسری ایکشن، چارج شیٹ نمبری No.226/PA مورخہ 01-10-2021 بجاریہ جناب

DPO صاحب مردان مشمولہ حسب ذیل مفروض خدمت ہوں۔

1- یہ کہ مراسلہ تحریر شدہ نہ میں نے لکھا ہے نہ میں نے Dictaid کیا ہے۔ اور نہ ہی میرا ہینڈ رائٹنگ ہے۔ بلکہ تمام تر کاروائی غلط اور بوگس ہے۔ میرے نوٹس میں لائے بغیر مراسلہ تحریر شدہ بھی نیاز علی LHC نے متذکرہ اندراج کیلئے خود تھانہ پہنچایا ہے۔

2- یہ کہ نہ میں نے ملزم کامران ولد نور حبیب ساکن نواں کلی طور و گوگرفار کیا ہے، نہ دیکھا ہے اور نہ ہی اُسے جانتا ہوں۔

3- یہ کہ مورخہ 02-09-2021 کو میں نے نہ ملزم کامران کیلئے ریمانڈ جوڈیشل تحریر کیا ہے اور نہ ہی اُس پر میرا اور جینل دستخط ہے۔ بلکہ تمام تر کاروائی بوگس ہے۔

4- یہ کہ اگر افسران بالا مناسب سمجھے تو مراسلہ تحریر شدہ ریمانڈ جوڈیشل تحریر شدہ اور فرد مقبوضہ کی تحریر شدہ اور اُن پر دستخط مثبت شدہ کے نسبت گواہان فرد کے علاوہ بذریعہ ہینڈ رائٹنگ ماہر FSL پشاور تصدیق اور تسلی کا ممنون ہوں گا۔

5- یہ کہ LHC نیاز علی متعینہ چونکہ شہیدان نے مراسلہ فرد اور چکلہ ضمانت ملزم اور ریمانڈ جوڈیشل اپنی مرضی سے تحریر کر کے اُن پر میرا بوگس دستخط ہائے میرے اجازت کے بغیر، مجھے بتائے بغیر، دکھائے بغیر مثبت کیے ہیں۔ اور ملزم کامران سے ساز باز کر کے اُس کو فرضی چکلہ پر رہائی دلائی ہے۔

6- یہ کہ تھانہ سے واپس چوکی پہنچنے پر میں نے LHC نیاز علی سے ملزم کے نسبت معلومات پر اُس نے بتلایا کہ اُس کو میں نے چھوڑا ہے اور خود کل مورخہ 02-09-2021 کو عدالت متعلقہ آجائیگا۔

7- یہ کہ LHC نیاز علی نے مجھ سے دھوکہ دہی اور ملزم کامران کو فائدہ پہنچانے کے لئے مقدمہ

889 مورخہ 03-09-2021 برقم 302-324/34 PPC تھانہ طور و کونٹھان

Present  
Statement  
of  
the  
A...

پہنچانے کے علاوہ تباہ و برباد کیا ہے۔

8- یہ کہ مورخہ 02-09-2021 کو بذریعہ ریمانڈ جوڈیشل پیشکر دہ ملزم کامران LHC نیاز علی اور اس کے بھائی محمد طارق 627/LHC متعینہ پال برانچ مردان کے ساز باز سے کچہری مردان آکر انہوں نے چالان مکمل کی بجائے ریمانڈ جوڈیشل تحریر کر کے اُس پر میرا بوس دستخط ثبت کر کے سوچھے سمجھے سکیم کے تحت متعلقہ عدالت سے جوڈیشل لاک اپ بھیجوایا ہے۔

9- یہ کہ مورخہ 02-09-2021 کو LHC نیاز علی اور اُس کا بھائی محمد طارق نمبر 627/LHC باقاعدہ ملزم کامران کے ساتھ کچہری مردان میں موجود تھے۔ جو اُن کے مابین کئی دنوں سے صلاح مشورہ معلوم ہونے کا دلیل ہے۔

10- یہ کہ LHC نیاز علی اور اُس کے بھائی محمد طارق 627/LHC اور ملزم کامران آپس میں موبائل فون پر رابطے، اُن کے مابین نزدیکی تعلق کا زندہ ثبوت کے علاوہ اُن کے CDR سے بھی تصدیق کر سکتے ہیں۔

11- یہ کہ LHC نیاز علی اور اُس کے بھائی محمد طارق 627/LHC نے تمام تر کاروائی ملزم کامران کو مقدمہ مثل میں دعویداری سے بچانے کی خاطر اپنے فورس کا ناجائز فائدہ اٹھا کر کیا ہے۔ درحقیقت یہ ہے کہ میں بحیثیت انچارج چوکی شہیدان حسب حکم افسران بالا تعینات ہوں۔ مورخہ 01-09-2021 کو حسب اجازت شب یا شبی گھر خود سے واپس چوکی شہیدان آنے پر حسب اطلاع، حسب ہدایت تھانہ رستم کے موبائل گشت میں بطور انچارج موبائل افسر ڈیوٹی پر تھا۔ کہ اس دوران LHC نیاز علی جو کہ چوکی شہیدان میں میرے ساتھ ڈیوٹی کر رہا ہے نے مجھے بذریعہ موبائل فون کال کی کہ ایک جوان العمر کو بالائے سنسپستول 30 بوریسمیت گرفتار کیا گیا ہے۔ تمہارے طرف سے مقدمہ درج کر کیا جائے۔ جواب میں نے کہا کہ ملزم سمیت مال مقدمہ تھانہ رستم پہنچایا جائے۔

پھر مقدمہ درج رجسٹر کیا جائے۔ اُس کے ملی بھگت اور ساز باز سے ملزم جو نہ میں اور نہ ہی جناب SHO صاحب دیکھا تھا۔ نہ سنا تھا۔ میرے اور SHO کے اجازت کے بغیر ملزم کو چھوڑ کر مقدمہ علت نمبر 1057 مورخہ 01-09-2021 جرم 15AA تھانہ رستم برخلاف ملزم کامران ولد نور حبیب سکنتہ نواں کلی طور درج رجسٹر کر کے دوسرے روز مورخہ 02-09-2021 کو اپنے بھائی محمد طارق 627/LHC متعلقہ پال برانچ مردان کے صلاح مشورہ سے کچہری مردان متعلقہ

عدالت طلب کر کے وقوعہ مقدمہ 889 مورخہ 03-09-2021 جرم 302-324/34 تھانہ طورو

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مردان سرزد کرنے کی خاطر قصداً عملاً جوڈیشل حوالات سنٹرل جیل مردان بھیجوا گیا ہے۔ تاکہ ملزم کا مران مقدمہ قتل میں دعویداری سے بچ سکے۔

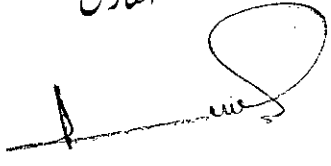
جناب والا کے حضور اقدس میں نہایت عاجزانہ التماس ہے۔ کہ یہ تمام تر کارروائی LHC نیاز علی اور اس کے بھائی محمد طارق 627/LHC متعلقہ پال برانچ مردان اور ملزم کا مران کے پہلے سے باقاعدہ صلاح مشورہ تھا۔ اور مورخہ 01-09-2021 کو میرے چوکی میں عدم موجودگی کا فائدہ اٹھا کر تمام ترمیم داری میرے سر پر ڈال کر میرے طرف سے تمام خط و کتابت بوگس طریقے سے تحریر کے تمام کارروائی پر میرا بوگس دستخط ہائے مثبت کر کے میرے اور میرے بچوں کے ساتھ انتہائی ظلم کے علاوہ پولیس فورس کو بدنام کرنے کے ساتھ ساتھ مقدمہ قتل بھی تباہ و برباد کیا ہے۔

اللہ تعالیٰ کو حاضر و ناظر جانتے ہوئے تمام تر کارروائی سے لاعلم ہوں۔ جس کے نسبت افسران بالا کے روبرو ہر قسم تسلی کے ساتھ ساتھ گواہان فرد اور میرے موبائل کا CDR بھی گواہ ہیں۔

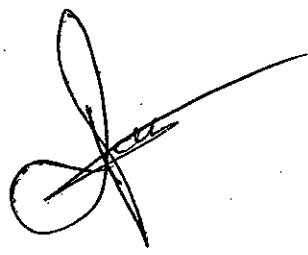
اشدعا ہے کہ میرے خلاف چارج شیٹ ہذا مشمولہ بلا کسی مزید محکمانہ کارروائی داخل دفتر فرما کر مجھے معطلی سے بحال فرما کر سائل تاحیات آپ کی بلند اقبالی کا دُعا گور ہے گا۔

تحریر: 01-11-2021

العارض



تابع دار عابد خان IHC/3293 معطل پولیس لائن مردان



Legal  
Sindh

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DISCIPLINARY ACTION AGAINST IHC ABID KHAN NO. 3293.

Kindly refer to your office diary No.226/PA, dated 01.10.2021.

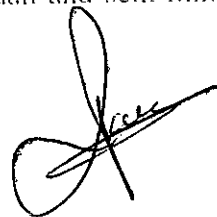
ALLEGATIONS:-

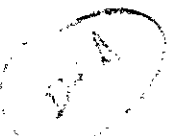
Whereas. IHC ABID KHAN NO.3293, while posted as in-charge PP shaheedan, (now under suspension police lines Mardan) was found negligence for the following irregularities, as per SDPO Rural Mardan office letter No.1299/R dated 07-09-2021:-

- 1) On 01.09.2021, he accompanied by LHC Niaz Ali No.2697 etc arrested one kamran r/o nawan kaly Toru and recovered a (30) bore pistol without number and license & (05) rounds from him during routine patrolling vide case FIR No.1057 dated 01.09.2021 15AA PS Rustam.
- 2) On 02.09.2021, he (IHC Abid khan) prepared Remand judicial challan and sent to the court through Constable Ayaz No.1663 with advice that the accused is waiting in Mardan kacheri. On reaching Mardan kacheri, he found LHC Niaz Ali No.2697 along with accused kamran, so he handed over the remand judicial papers to LHC Niaz Ali, who produced the accused to the court wherein the accused couldn't produce any surety, so the court fined him Rs.1000/-, but intentionally the accused regretted by not paying the amount, so he was sent to judicial lock up. The main purpose behind preferring judicial lock up was that on 03.09.2021, the brother of accused Amir Sajjad committed murder vide case FIR No. 889 dated 03.09.2021 u/s 302/324/34 PPC PS Toru, in which he (accused kamran) was also charged for the commission of crime.
- 3) As per SP/Investigation Mardan vide his office letter No.531/PA/Inv. dated 06.09.2021, highlights that accused kamran in connivance with LHC Muhammad Tariq No. 627 of PAI, Branch office Mardan and his brother LHC Niaz Ali No. 2697 of PP Shaheedan ( Now both suspended) registered the above case against himself, because on the day and at the time of occurrence accused kamran was not present on the spot and no direct recovery has been made from him, while on the next day (02.09.2021), accused Kamran was handed over to Constable Ayaz Ali No. 1663 without handcuffs in the court, wherein accused Kamran was sent to judicial lock up Mardan. From the preliminary inquiry, it has been found that accused Kamran in connivance with LHC Muhammad Tariq has planned his entrance to Mardan jail and this fact has been accepted by all.
- 4) From the above discussion the involvement of IHC Abid Khan in this plan/episode cannot be ruled out.

PROCEEDINGS:-

The undersigned conducted enquiry in the subject matter where the alleged officer was called to the office and enquired about the matter. His written statement was also recorded and placed on file. The delinquent officer stated in his written statement, that neither he wrote the Murasila of the above cited case nor dictate anyone. He stated that the instant Murasila has been written by LHC Niaz ali and also brought it to Police station without bringing in his notice. On 02.09.2021, he (IHC Abid) neither prepared Remand Judicial nor signed it. He requested to send the same to FSL Peshawar for analyzing. He blamed LHC Niaz Ali of PP Shaheedan for the whole blunder that he intentionally did fraud and assisted accused kamran charged in above cited case and sent him to judicial lock-up on his bogus signature. He further stated that LHC Tariq is the brother of LHC Niaz Ali and accused Kamran is his closed friend who prepared the proper plan for the whole scenario. He further disclose that on 01.09.2021, after arrival from routine shabach, he was on duty as mobile officer in PS Rustam mobile where LHC Niaz Ali called him that he has arrested a young man along with an unlicensed pistol 30 bore and asked to register an FIR against him. Hence, a case FIR No. 1057 dated 01.09.2021 u/s 15AA PS Rustam was registered against Kamran s/o Noor Habib r/o nawa kaly and accused was released on Mashalka by LHC Niaz Ali. On 02.09.2021, LHC Niaz Ali along with his brother LHC Tariq No.627 posted at PAI, Branch Mardan called the accused Kamran to kacheri Mardan and sent him to judicial lock-up knowing the intention of committing crime of Kamran.





Date -

① ~~(9)~~ (21) ⑧

It is worth mention here that during preliminary inquiry conducted by w/SP Investigation Mardan, he (IHC Abid) admit that FIR registered u/s 15AA had been brought in his notice by the IHC Naz Ali and he agreed with it while now he has been found refused from the instant proceeding, so a clear contradiction have been found in his previous and present statement.

In order to further probe the matter, investigation officer along with case file was called to the office and the case file was thoroughly perused. From perusal of the case file of FIR No. 889 dated 03.09.2021 u/s 302/324/34 PPC PS Toru, it came to surface that the accused Kamran was released on bail on the grounds that he was charged and arrested in case FIR No. 1057 dated 01.09.2021 u/s 15AA PS Rustam at the time of occurrence of the murder vide Order No. 04 dated 27.09.2021. Moreover, during chalking of FIR the location of accused Kamran was noted at Nawwan Kaly Toru road (CDR copy attached).

RECOMMENDATION:

Keeping in view enquiry conducted, the undersigned reached to the conclusion that the delinquent officer registered FIR against accused Kamran without checking the accused and case property. Similarly, he also deviated from the registration of FIR and his signatures. Therefore, he is found guilty and recommended for **Major Punishment** if agreed, please.

No. 634 /St-SMT  
Dated. 13/11/2021

(Adnan Azam Khan)  
Deputy Superintendent of Police,  
S.M.T-Circle

OR  
~~DDG/MAN~~

FCN  
22.2.2022

  
DSP Legal  
Mardan

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06-08-2021  
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0346 5491 598

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

Tel No. 0937-9230109 & Fax No. 0937-9230111  
Email: [dpomdn@gmail.com](mailto:dpomdn@gmail.com)

2022

No 1076-77 /PA

Dated 7 12 /2022

**FINAL SHOW CAUSE NOTICE**

**IHC Abid Khan No.3293**, while posted as In-charge PP Shaheedan (now under suspension Police Lines Mardan) was found of negligence for the following irregularities, as per SDPO Rural Mardan office letter No.1299/R dated 07-09-2021 :-

- 1) On 01-09-2021, you accompanied by LHC Niaz Ali No.2697 etc arrested one Kamran r/o Nawan Killy Toru with a (30) bore without number and unlicensed pistol & (05) rounds during routine patrolling vide case FIR No.1057 dated 01-09-2021 U/S 15AA PS Rustam.
- 2) On 02-09-2021, you have prepared Remand Judicial Challan and sent it to the Court through Constable Ayaz No.1663 with advice that the accused is waiting at Mardan Katchpri. On reaching Mardan Katcheri, Constable Ayaz found LHC Niaz Ali No. 2697 along-with accused Kamran, so he handed-over the Remand Judicial papers to LHC Niaz Ali, who produced the accused to the Court wherein the accused couldn't produce any surety, so the Court fined him of Rs.1000/-, but intentionally the accused regretted by not paying the fined amount, so he was sent to Judicial Lock-up. The main purpose behind preferring Judicial Lock-up was that on 03-09-2021, brother of accused namely Amir Sajjad committed murder vide case FIR No.889 dated 03-09-2021 U/S 302/324/34 PPC PS Toru, in which, he (accused Kamran) was also charged for the commission of crime.
- 3) As per SP/Investigation Mardan vide his office letter No.531/PA/Inv: dated 06-09-2021, highlighting that accused Kamran in connivance with LHC Muhammad Tariq No.627 of PAL Office Mardan and his brother LHC Niaz Ali No. 2697 of PP Shaheedan (Now both suspended) registered the above quoted case against himself, because on the day and at the time of occurrence, accused Kamran was not present on the spot and no direct recovery has been made from him, while on the next day (02-09-2021), accused Kamran was handed-over to Constable Ayaz Ali No.1663 without handcuffs in the Court, wherein before the concerned Magistrate, accused Kamran resiled from his statement and was sent to Judicial Lockup Mardan. From the preliminary enquiry, it has been found that accused Kamran in connivance with LHC Muhammad Tariq has planned his entrance to Mardan Jail and this fact has been accepted by all.
- 4) From the above discussion, your involvement in this episode/plan can't be ruled-out.

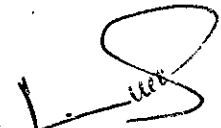
In this connection, during the course of Departmental Enquiry, conducted by Mr. Adnan Azam SDPO Sheikh Maltoon vide his office letter No.634/St-SMT dated 13-12-2021, in pursuance of this office Statement of Disciplinary Action/Charge Sheet No.226/PA, dated 01-10-2021, holding responsible you of gross misconduct & recommended for major punishment. You were heard in OR on 02-02-2022, during which, you have failed to present any plausible reason in your defense.

Therefore, it is proposed to impose Major/Minor penalty as envisaged under Rules 4 (b) of the Khyber Pakhtunkhwa Police Rules 1975.


Hence, I Dr. Zahid Ullah (PSP) District Police Officer Mardan, in exercise of the power vested in me under Rules 5 (3) (a) & (b) of the Khyber Pakhtunkhwa Police Rules 1975 call upon you to Show Cause Finally as to why the proposed punishment should not be awarded to you.

Your reply shall reach this office within 07 days of receipt of this Notice, failing which; it will be presumed that you have no explanation to offer.

You are liberty to appear for personal hearing before the undersigned.

Received by 

Dated: 02/02/2022

  
(Dr. Zahid Ullah) PSP  
District Police Officer  
Mardan

Copy to RI Police Lines Mardan (**Attention Reader**) to deliver this Notice upon the alleged official & the receipt thereof shall be returned to this office within (05) days positively for onward necessary action.

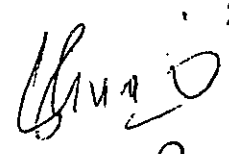


RECEIVED  
INVESTIGATION  
SECTION  
POLICE

NO. 1125  
DATE 08/02/2022

جناب عالی

تذکرہ ایس جی کے 181 شمارہ سٹریٹنگز دیپٹی سب ڈیویژن  
سائبرجیٹ خان میٹر / 3283 میٹر / 1142 / 13283  
حصہ سیم ایوٹو ٹریڈنگ ڈیویژن

محمد علی شاہ صاحب / 10 سہ ماہی  


RI-PL-MRD

08/02/2022

24

جناب عالی:-

بحوالہ ڈپینٹری ایکشن، شوکاژ نوٹس نمبری No. 1076/77/PA مورخہ 07-02-2022 مجاریہ جناب DPO صاحب مردان شمولہ حسب ذیل مغروض خدمت ہوں۔

1- یہ کہ مراسلہ تحریر شدہ نہ میں نے لکھا ہے نہ میں نے Dictaid کیا ہے۔ اور نہ ہی میرا ہینڈ رائٹنگ ہے۔ بلکہ تمام تر کاروائی غلط اور بوگس ہے۔ میرے نوٹس میں لائے بغیر مراسلہ تحریر شدہ بھی نیاز علی LHC نے متذکرہ اندراج کیلئے خود تھانہ پہنچایا ہے۔

2- یہ کہ نہ میں نے ملزم کامران ولد نور حبیب ساکن نواں کلی طور و گوگر قرار کیا ہے، نہ دیکھا ہے اور نہ ہی اُسے جانتا ہوں۔

3- یہ کہ مورخہ 02-09-2021 کو میں نے نہ ملزم کامران کیلئے ریمانڈ جوڈیشل تحریر کیا ہے اور نہ ہی اُس پر میرا اور بجٹل دستخط ہے۔ بلکہ تمام تر کاروائی بوگس ہے۔

4- یہ کہ اگر افسران بالا مناسب سمجھے تو مراسلہ تحریر شدہ ریمانڈ جوڈیشل تحریر شدہ اور فرد مقبوضگی تحریر شدہ اور اُن پر دستخط مثبت شدہ کے نسبت گواہان فرد کے علاوہ بذریعہ ہینڈ رائٹنگ ماہر FSL پشاور تصدیق اور تسلی کا ممنون ہوں گا۔

5- یہ کہ LHC نیاز علی متعینہ چوکی شہیدان نے مراسلہ فرد اور مچلکہ ضمانت ملزم اور ریمانڈ جوڈیشل اپنی مرضی سے تحریر کر کے اُن پر میرا بوگس دستخط ہائے میرے اجازت کے بغیر، مجھے بتائے بغیر، دکھائے بغیر مثبت کیے ہیں۔ اور ملزم کامران سے ساز باز کر کے اُس کو فرضی مچلکہ پر رہائی دلائی ہے۔

6- یہ کہ تھانہ سے واپس چوکی پہنچنے پر میں نے LHC نیاز علی سے ملزم کے نسبت معلومات پر اُس نے بتلایا کہ اُس کو میں نے چھوڑا ہے اور خود کل مورخہ 02-09-2021 کو عدالت متعلقہ آجایا گا۔

7- یہ کہ LHC نیاز علی نے مجھ سے دھوکہ دہی اور ملزم کامران کو فائدہ پہنچانے کے لئے مقدمہ 889 مورخہ 03-09-2021 جرم PPC302-324/34 تھانہ طور کو نقصان

OR  
DPD MD  
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پہنچانے کے علاوہ تباہ و برباد کیا ہے۔

(25)

8- یہ کہ مورخہ 02-09-2021 کو بذریعہ ریمائنڈ جوڈیشل پیشکر دہ ملزم کا مران LHC نیاز علی اور اس کے بھائی محمد طارق 627/LHC متعینہ پال برانچ مردان کے ساز باز سے کچھری مردان آکر انہوں نے چالان مکمل کی بجائے ریمائنڈ جوڈیشل تحریر کر کے اُس پر میرا بگس دستخط ثبت کر کے سوچھے سمجھے سکیم کے تحت متعلقہ عدالت سے جوڈیشل لاک اپ بھیجوا یا ہے۔

9- یہ کہ مورخہ 02-09-2021 کو LHC نیاز علی اور اُس کا بھائی محمد طارق نمبر 627/LHC باقاعدہ ملزم کا مران کے ساتھ کچھری مردان میں موجود تھے۔ جو اُن کے مابین کئی دنوں سے صلاح مشورہ معلوم ہونے کا دلیل ہے۔

10- یہ کہ LHC نیاز علی اور اُس کے بھائی محمد طارق 627/LHC اور ملزم کا مران آپس میں موبائل فون پر رابطے، اُن کے مابین نزدیکی تعلق کا زندہ ثبوت کے علاوہ اُن کے CDR سے بھی تصدیق کر سکتے ہیں۔

11- یہ کہ LHC نیاز علی اور اُس کے بھائی محمد طارق 627/LHC نے تمام تر کاروائی ملزم کا مران کو مقدمہ مثل میں دعویداری سے بچانے کی خاطر اپنے فورس کا ناجائز فائدہ اٹھا کر کیا ہے۔ درحقیقت یہ ہے کہ میں بحیثیت انچارج چوکی شہیدان حسب حکم افسران بالا تعینات ہوں۔ مورخہ 01-09-2021 کو حسب اجازت شب یا شبی گھر خود سے واپس چوکی شہیدان آنے پر حسب اطلاع، حسب ہدایت تھانہ رستم کے موبائل گشت میں بطور انچارج موبائل افسر ڈیوٹی پر تھا۔ کہ اس دوران LHC نیاز علی جو کہ چوکی شہیدان میں میرے ساتھ ڈیوٹی کر رہا ہے نے مجھے بذریعہ موبائل فون کال کی کہ ایک جوان العمر کو بلا لائنس پستول 30 بوریسمیت گرفتار کیا گیا ہے۔ تمہارے طرف سے مقدمہ درج کر لیا جائے۔ جو اب میں نے کہا کہ ملزم سمیت مال مقدمہ تھانہ رستم پہنچایا جائے۔

پھر مقدمہ درج کر لیا جائے۔ اُس کے ملی بھگت اور ساز باز سے ملزم جو نہ میں اور نہ ہی جناب SHO صاحب دیکھا تھا۔ نہ سنا تھا۔ میرے اور SHO کے اجازت کے بغیر ملزم کو چھوڑ کر مقدمہ علت نمبر 1057 مورخہ 01-09-2021 جرم 15AA تھانہ رستم برخلاف ملزم کا مران ولد نور حبیب سکند نواں علی طور درج کر کے دوسرے روز مورخہ 02-09-2021 کو اپنے بھائی محمد طارق 627/LHC متعلقہ پال برانچ مردان کے صلاح مشورہ سے کچھری مردان متعلقہ عدالت طلب کر کے وقوعہ مقدمہ 889 مورخہ 03-09-2021 جرم 302-324/34 تھانہ طورو

*[Handwritten Signature]*

*[Handwritten Text]*

(13)

مردان سرزد کرنے کی خاطر قصداً عملاً جوڈیشل حوالات سنٹرل جیل مردان بھیجوا یا گیا ہے۔ تاکہ ملزم کامران مقدمہ قتل میں دعویداری سے بچ سکے۔

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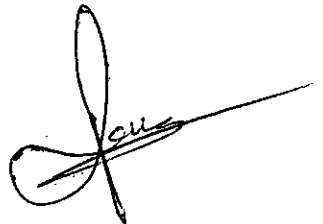
جناب والا کے حضور اقدس میں نہایت عاجزانہ التماس ہے۔ کہ یہ تمام تر کاروائی LHC نیاز علی اور اس کے بھائی محمد طارق 627/LHC متعلقہ پال برانچ مردان اور ملزم کامران کے پہلے سے باقاعدہ صلاح مشورہ تھا۔ اور مورخہ 01-09-2021 کو میرے چوٹی میں عدم موجودگی کا فائدہ اٹھا کر تمام تر ذمہ داری میرے سر پر ڈال کر میرے طرف سے تمام خط و کتابت بوگس طریقے سے تحریر کے تمام کاروائی پر میرا بوگس دستخط ہائے ثبت کر کے میرے اور میرے بچوں کے ساتھ انتہائی ظلم کے علاوہ پولیس فورس کو بدنام کرنے کے ساتھ ساتھ مقدمہ قتل بھی تباہ و برباد کیا ہے۔

اللہ تعالیٰ کو حاضر و ناظر جانتے ہوئے تمام تر کاروائی سے لاعلم ہوں۔ جس کے نسبت افسران بالا کے روبرو ہر قسم تسلی کے ساتھ ساتھ گواہان فرد اور میرے موبائل کا CDR بھی گواہ ہیں۔

استدعا ہے کہ میرے خلاف چارج شیٹ ہذا مشمولہ بلا کسی مزید حکمانہ کاروائی داخل دفتر فرما کر مجھے معطلی سے بحال فرما کر سائل تاحیات آپ کی بلند اقبالی کا دعا گو رہے گا۔

العارض

تابعدار عابد خان IHC/3293 معطل پولیس لائن مردان



مردان سرزد کرنے کی خاطر قصداً عملاً جوڈیشل حوالات سنٹرل جیل مردان بھیجوا یا گیا ہے۔ تاکہ ملزم کامران مقدمہ قتل میں دعویداری سے بچ سکے۔

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OFFICE OF THE **Annexure F**  
**DISTRICT POLICE OFFICER,**  
**MARDAN**

Tel No. 0937-9230109 & Fax No. 0937-9230111  
Email: [dpomdn@gmail.com](mailto:dpomdn@gmail.com)

2022

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No. 9125-27 /PA

Dated 10/13/2022

**ORDER ON ENQUIRY OF IHC ABID KHAN NO. 3293**

This order will dispose-off a Departmental Enquiry under Police Rules 1975, initiated against the IHC Abid Khan on the report of SDPO Rural circle containing the allegations of criminal negligence and gross misconduct. Brief facts of the case are that:-

During routine patrolling on 01-09-2021, IHC Abid Khan No.3293 & LHC Niaz Ali No.2697 etc of PP Shaheedan arrested Kamran r/o Nawan Kille Toru with a 30 bore unlicensed pistol along with five bullet rounds and a case FIR No.1057 dated 01-09-2021 U/S 15AA PS Rustam was registered against him.

On the next day IHC Abid Khan prepared a report for obtaining judicial remand and sent it to the Court through Constable Ayaz No.1663 with advice that the accused Kamran will be waiting at Mardan Katcheri. On reaching Mardan Katcheri, constable Ayaz found LHC Niaz Ali No. 2697 who was standing with accused Kamran, so constable Ayaz handed-over the report for obtaining judicial remand to LHC Niaz Ali. The accused was produced in the Court by LHC Niaz Ali wherein, the accused couldn't produce any surety so the Court fined him Rs.1000/-, but the accused did not pay the above mentioned fine due to which he was sent to judicial lock up. The main motive behind sending the accused to judicial lock-up was that on 03-09-2021 the brother of accused namely Amir Sajjad had to commit murder with the connivance of his brother and the delinquent official. Later on, a case vide FIR No.889 dated 03-09-2021 U/S 302/324/34 PPC PS Toru was registered in which the accused Kamran was also charged for the commission of offence.

It is worth mentioning that SP/Investigation Mardan vide his office letter No.531/PA/Inv: dated 06-09-2021 also highlighted the fact that accused Kamran in connivance with IHC Abid Khan, LHC Niaz Ali No. 2697 and LHC Tariq Ali malafidely got registered the above mentioned case so as to entitle the accused for plea of alibi in a murder case and the accused Kamran was presented in court without handcuffs for entitling him to judicial lock up.

Page 1 of 2

  
**DSP Legal**  
**Mardan**

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During the course of Departmental Enquiry, conducted by Mr. Adnan Kamran SDPO Sheikhpur Maltoon vide his office letter No.634/St-SMT dated 13-12-2021, it was proved that the delinquent official acted in connivance by falsely implicating the accused Kamran in a minor offence to save him from FIR No.889 dated 03-09-2021 U/S 302/324/34 PPC PS Toru, holding IHC Abid Ali guilty of gross misconduct and hence recommended for major punishment. During his hearing in O.R on 02-02-2022, he failed to present any plausible reason in his defense, therefore, he (IHC Abid Ali) was served with a Final Show Cause Notice, under Khyber Pakhtunkhwa Police Rules-1975, issued vide this office No.1076-77/PA dated 07-02-2022, to which, his reply was received and found unsatisfactory.

Final Order

IHC Abid Ali was heard in OR on 09-03-2022, during which, he failed to present any plausible reasons in his defense, therefore, keeping in view the findings of the Enquiry Officer & material on record, the allegations leveled against the delinquent official have been proved, therefore, awarded him major punishment of dismissal from service with immediate effect, in exercise of the power vested in me under Police Rules-1975.

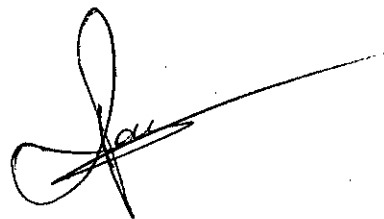
OB No. 633

Dated 9/03/2022

  
 (Dr. Lahir Ullah) PSP  
 District Police Officer  
 Mardan

Copy forwarded for information & n/action to:-

- 1) The DSP/HQrs Mardan.
- 2) The P.O & E.O (Police Office) Mardan.
- 3) The OSI (Police Office) Mardan with ( ) Sheets.



DSP Legal  
 Mardan

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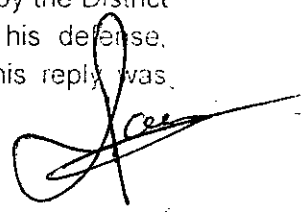
This case will dispose-off the departmental appeal preferred by Ex-IHC No. 3253 of Mardan District Police, against the order of District Police Officer, Mardan whereby he was awarded major punishment of dismissal from service vide OB: No. 633 dated 09.03.2022. The appellant was proceeded against departmentally on the basis of report of Sub Divisional Police Officer, (SDPO) Rural, Mardan containing the allegations of criminal negligence and gross misconduct.

As on 01.09.2021 during routine patrolling, delinquent Officer and LHC Niaz Ali No.2697 etc of Police Post Shaheedan Police Station Rustam, Mardan arrested Kamran r/o Nawan Killely Toru with a 30 bore unlicensed pistol along with five live rounds and a case vide FIR No.1057 dated 01.09.2021 U/S 15-AA Police Station Rustam was registered against him.

On the next day i.e 02.09.2021 the delinquent Officer drafted application for obtaining judicial remand and sent it to the Court through Constable Ayaz No.1663 with advice that the accused Kamran will be waiting at Mardan Katcheri. On reaching Mardan Katcheri, constable Ayaz found LHC Niaz Ali No. 2697 who was accompanied by accused Kamran, so constable Ayaz handed-over the said documents to LHC Niaz Ali. The accused was produced in the Court by LHC Niaz Ali as he (accused) couldn't produce any surety so the Court awarded him punishment of fine to the tune of Rs.1000/-, but the accused did not pay the above mentioned fine due to which he was sent to judicial lock up. The main motive behind sending the accused to judicial lock-up was that on 03-09-2021 the brother of accused namely Amir Sajjad had to commit murder with the connivance of his brother and the delinquent Officer. Later on, a case vide FIR No.889 dated 03.09.2021 U/S 302/324/34-PPC Police Station, Toru was registered in which the accused Kamran was also charged for the commission of offence.

It is worth mentioning that Superintendent of Police Investigation, Mardan vide his office letter No.531/PA/Inv: dated 06-09-2021 also highlighted the fact that accused Kamran in connivance with LHC Tariq Ali, delinquent Officer and LHC Niaz Ali No. 2697 malafidely got registered the above mentioned case so as to entitle the accused for plea of alibi in a murder case and the accused Kamran was presented before the Court without handcuffs.

Proper departmental enquiry proceedings were initiated against him and enquiry was entrusted to Mr. Adnan Azam Sub Divisional Police Officer (SDPO) Sheikh Maltoon, Mardan. During the course of enquiry it was proved that the delinquent Officer in active connivance with accused Kamran booked him in the aforementioned case for extending benefits as the accused and his brother had managed/planned the murder as a result of which they succeeded in their design and 02 persons lost their lives vide case FIR No.889 dated 03-09-2021 U/S 302/324/34 PPC Police Station Toru. The enquiry Officer held the delinquent Officer guilty of gross misconduct and recommended for major punishment. During his hearing in Orderly Room on 02-02-2022 by the District Police Officer, Mardan, he failed to present any plausible reason in his defense, therefore, he was served with a Final Show Cause Notice, to which, his reply was received and found unsatisfactory.

  
DSO, Mardan  
Mardan

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The delinquent Officer was again heard in Orderly Room on 09.03.2022 by the District Police Officer, Mardan but this time too he failed to present any cogent reasons in his defense, therefore, he was awarded major punishment of dismissal from service with immediate effect

Feeling aggrieved from the order of District Police Officer, Mardan, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 31.03.2022.

From the perusal of the enquiry file and service record of the appellant, it has been found that allegations leveled against the appellant have been proved beyond any shadow of doubt. Moreover, the Investigating Officer of case FIR No. No.889 dated 03-09-2021 U/S 302/324/34 PPC Police Station Toru also affirmed the involvement of appellant in this heinous criminal case because Call Data Record of accused Kamran revealed that he was present in his village Toru despite his arrest in case FIR No. 1057 dated 01.09.2021 U/S 15-AA Police Station Rustam and on the very next day he came to District Courts, Mardan from his home where from he was sent to District Jail, Mardan. The accused Officer namely Abid Khan No. 3293 (appellant) staged the drama of the FIR for sending accused Kamran to Jail just to facilitate him in a murder which the brother of the accused planned to commit after two days. Hence, the involvement of appellant in such like activities is clearly a stigma on his conduct. Therefore, the retention of appellant in Police Department will stigmatize the prestige of entire Police Force as instead of fighting crime, he has himself indulged in criminal activities. Moreover, he could not present any cogent justification regarding his innocence.

Keeping in view the above, I, Yaseen Farooq, PSP Regional Police Officer, Mardan, being the appellate authority, find no substance in the appeal, therefore, the same is rejected and filed, being devoid of merit.

Order Announced.

*Yaseen Farooq*  
Regional Police Officer,  
Mardan.

No. 2769 /ES, Dated Mardan the 05/04 /2022.

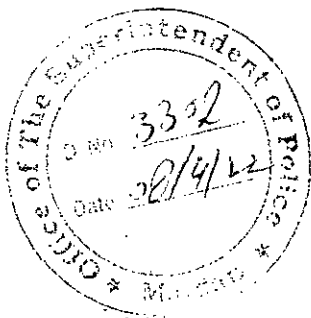
Copy forwarded to District Police Officer, Mardan for information and necessary w/r to his office Memo: No. 62/LB dated 25.03.2022. His Service Record is returned herewith.

(\*\*\*\*\*)

*DSP Legal/EC*  
*En mention*

*DPD/MR*

*Jale*



2022  
APR 05





(31) Amme + UNE  
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(18)

2023

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

Tel No. 0937-9230109 & Fax No. 0937-9230111  
Email: [dpomdn@gmail.com](mailto:dpomdn@gmail.com)

No. 8982 /PA

Dated 10 / 10 / 2023

**DE-NOVO DISCIPLINARY ACTION**

I, **NAJEEB-UR-REHMAN BUGVI (PSP)**, District Police Officer Mardan, as competent authority am of the opinion that **IHC Abid Khan No.3293**, himself liable to be proceeded against, as he committed the following acts/omissions within the meaning of Police Rules 1975.

**STATEMENT OF ALLEGATIONS**

Whereas, **IHC Abid Khan No.3293**, while posted as In-charge P.P Shaheedan (now Police Lines Mardan) was found negligence for the following irregularities, as per SDPO Rural Mardan office letter No.1299/R dated 07-09-2021:- ✓

1) On 01-09-2021, he accompanied by LHC Niaz Ali No.2697 etc arrested one Kamran r/o Nawan Killy Toru with a (30) bore without number and unlicensed pistol & (05) rounds during routine patrolling vide case FIR No.1057 dated 01-09-2021 U/S 15AA PS Rustam.

2) On 02-09-2021, he (IHC Abid Khan) has prepared Remand Judicial Challan and sent it to the Court through Constable Ayaz No.1663 with advice that the accused is waiting at Mardan Katcheri. On reaching Mardan Katcheri, he found LHC Niaz Ali No. 2697 along-with accused Kamran, so he handed-over the Remand Judicial papers to LHC Niaz Ali, who produced the accused to the Court wherein the accused couldn't produce any surety, so the Court fined him of Rs.1000/-, but intentionally the accused regretted by not paying the fined amount, so he was sent to Judicial Lock-up. The main purpose behind preferring Judicial Lock-up was that on 03-09-2021, brother of accused namely Amir Sajjad committed murder vide case FIR No.889 dated 03-09-2021 U/S 302/324/34 PPC PS Toru, in which, he (accused Kamran) was also charged for the commission of crime.

3) As per SP/Investigation Mardan vide his office letter No.531/PA/inv: dated 06-09-2021, highlighting that accused Kamran in connivance with LHC Muhammad Tariq No.627 of PAL Office Mardan and his brother LHC Niaz Ali No. 2697 of PP Shaheedan (Now both suspended) registered the above quoted case against himself, because on the day and at the time of occurrence, accused Kamran was not present on the spot and no direct recovery has been made from him, while on the next day (02-09-2021), accused Kamran was handed-over to Constable Ayaz Ali No.1663 without handcuffs in the Court, wherein before the concerned Magistrate, accused Kamran resiled from his statement and was sent to Judicial Lockup Mardan. From the preliminary enquiry, it has been found that accused Kamran in connivance with LHC Muhammad Tariq has planned his entrance to Mardan Jail and this fact has been accepted by all.

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4) From the above discussion, the involvement of IHC Abid Khan in this episode/plan can't be ruled-out.

For the purpose of scrutinizing the conduct of the said accused official with reference to the above allegations, Mr. Abdul Hayee (PSP) Principal EPTC Nowshera is nominated as Enquiry Officer to conduct denovo proceedings as directed by DIG/IAB K.P Peshawar.

The Enquiry Officer shall, in accordance with the provision of Police Rules 1975, provides reasonable opportunity of hearing to the accused Police Officer, record/submit his findings and make within (30) days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused official.

IHC Abid Khan is directed to appear before the Enquiry Officer on the date + time and place fixed by the Enquiry Officer.

Received by IHC Abid Khan

*[Signature]* on /10/2023  
10-10-23

*[Signature]*

(Najeeb-ur-Rehman Bugvi) PSP  
District Police Officer, Mardan.

Copy forwarded to the Principal EPTC Nowshera for information & further necessary action with reference to his office letter No.3685-86/EPTC/NSR dated 02-10-2023.

*[Signature]*

PRINCIPAL  
ELITE POLICE TRAINING CENTRE  
NO. 105-106

*[Signature]*



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

Tel No. 0937-9230109 & Fax No. 0937-9230111.  
Email: [dpomdn@gmail.com](mailto:dpomdn@gmail.com)

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2023

**CHARGE SHEET (DE-NOVO PROCEEDINGS)**

I, NAJEEB-UR-REHMAN BUGVI (PSP), District Police Officer Mardan, as competent authority, hereby charge IHC Abid Khan No.3293, while posted as In-charge P.P Shaheedan (now Police Lines Mardan), as per attached Statement of Allegations.

1. By reasons of above, you appear to be guilty of misconduct under Police Rules, 1975 and have rendered yourself liable to all or any of the penalties specified in Police Rules, 1975.
2. You are, therefore, required to submit your written defense within 07 days of the receipt of this Charge Sheet to the Enquiry Officer, as the case may be.
3. Your written defense, if any, should reach the Enquiry Officers within the specified period, failing which, it shall be presumed that you have no defense to put-in and in that case, ex-parte action shall follow against you.
4. Intimate whether you desired to be heard in person:

*Attested*  
*[Signature]*  
PP-MARDAN  
POLICE OFFICER

*Najeeb*

(Najeeb-ur-Rehman Bugvi) PSP  
District Police Officer, Mardan.

*[Signature]*

MARDAN

the n.  
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Forensic Science Laboratory (FSL), for matching signatures  
and writings.  
sent it to

(28)

(34)

The Inquiry Officer(PSP),

Principle EPT Nowshera in Denovo Inquiry.

Respected sir,

(21)

Reply/statement of Abid Khan IHC submitted as under:

1. That I was appointed as constable in 2007 and successfully completed courses and then transferred to Elite Force where I performed my duties with zeal and fully devotion.
2. That, I have best service in highly appreciated and also granted commendation certificates and cash prizes on best performance. (Copy attached.)
3. That, my entire service is unblemished and there is no single complain against me during my entire service.
4. That, I was dismissed from service on 10.03.2022, on the grounds of misconduct, however, I am innocent and falsely/intentionally implicated in the case and dismissed from service.
5. That, dismissal order is illegal against law and facts and liable to be set aside on the following grounds.

Grounds:

- That, because I neither scribed/dedicated/signed the Murasila nor i arrested the accused.
- That, because for taking judicial remand of the accused, the remand was also not signed by me and the scribed signed of mine is bogus and based malafide and having some ulterior motives by other officials who planned this story.
- That, because I also brought these facts of fake sign etc. in the notice of Superiors but they didn't verified my signatures and writings from any relevant expert and nor sent it to Forensic Science Laboratory (FSL), for matching signatures and writings.

*Abid Khan*  
PRINCIPAL  
ELITE FORCE TRAINING CENTRE  
NOWSHERA  
12.10.23

*Legal*

**Legal  
Mardan**

- That, because the LHC Niaz Ali and his brother namely LHC Muhammad Tariq done all these illegal acts with due deliberations and consultations with accused Kamran without informing me and the superiors officials/inquiry officer perused the CDR of both Niaz Ali and Muhammad Tariq.
- That, because no impartial inquiry was conducted.
- That, because I was not provided opportunity of fair trial as envisaged in Article 10-A of the Constitution of Islamic Republic of Pakistan and principle of natural justice by not providing the opportunity to cross examine the accused and officials.
- That, because I having unblemished service record of about 15 years.
- That, because I was the sole bread earner of my family.

Prayer:

It is there humbly prayed to vanish the instant Denovo Inquiry as I was malafidely involved in the said act being innocent.

*[Handwritten signature]*

DSP Legal  
Mardan

سینئر ڈپٹی کمشنر  
 12-10-2023  
 16101-11498344-7

*[Handwritten signature]*  
 12-10-23  
 PRINCIPAL  
 ELITE POLICE TRAINING CENTRE  
 MUNSHERA

*[Handwritten signature]*  
 11-10-2023  
 Abid Khan (IHC 3293)  
 S/O Khan Gul  
 R/O Sawalder Tehsil & District Mardan.  
 Contact No. 0346-5491598

1- چارج شیٹ آپ کو کب ملی؟ اور کس آفس سے الیوٹا تھا؟ کیا وصولی کے دستوں نے اسے  
 جواب - حودتہ 10-10-23 کو ملی ہے۔ DPO مردان کے دفتر سے PA فضل قادر سے وصولی - وصولی کے  
 دستوں نے کیے۔  
 2- آپ انگریزی زبان پڑھ اور سمجھتے ہیں؟ آپ کو چارج شیٹ کس نے سمجھائی ہے؟  
 جواب - انگریزی پڑھ لکھا ہوں۔ اور کھوڑا سمجھ لکھا ہوا ہے۔ مجھے عملیاتی اور وکٹ مردان پورے عدالتوں میں سمجھائی  
 3- چارج شیٹ کا جواب کس نے فرمایا ہے؟ اس پر کس نے دستخط کیا ہے؟  
 جواب - میں نے فرمایا ہے۔ اس پر کس نے دستخط کیا ہے؟

The A: Legal,

4 - حوضہ 01.9.2021 کو آج کے لئے

5- جب انٹریز لینا سمجھتے تو آپ کا جواب حارثہ ٹیٹ (انٹریز میں ہے؟  
یہ کس نے کر لیا؟

جواب - میں نے اردو میں جواب لکھا اور کھول میں جا کر ایک ویکل جن کا نام یاد نہیں ہے  
اس سے انٹریز میں ترجمہ کر دیا۔ اور اس جواب کو پورا سمجھا ہوں

6- حوضہ 01.9.2021 کو آپ جو کئی سے ٹیٹ کیلئے ایک روانہ ہوئے؟

جواب - صبح کے وقت، ٹائم یاد نہیں۔ روزنامہ میں لکھا ہے۔

7- اس ٹیٹ پر آپ کے ساتھ کون کون کئے؟ کیا یہ حوالہ ٹیٹ تھی یا سیدل؟

جواب - میں جو کئی سے پریسٹیجیٹ گاڑی پر بیٹھ کر کسانہ رسم حسب اطلاع حوضہ ٹیٹ کیے گیا۔ جو کئی سے میرے  
ساتھ ٹیٹ لکھی روانہ لینا ہوئی۔

8- سوال - تھانہ جا کر آپ کب ٹیٹ لکھے تھے؟ حوالہ ٹیٹ یا سیدل؟ اور کون کون آپ کے ساتھ گئے؟  
جواب - تقریباً 9 یا 10 بجے دن کا وقت تھا۔ حوالہ ٹیٹ تھی۔ لکھی کے متعلق یاد نہیں۔

9- آپ نے حوالہ ٹیٹ کس عہدہ میں کیا؟

جواب - رستم مازار۔ نواں مکی۔ مورتا۔ شہیدان علی، وطنیہ و وطنیہ

10- آپ دوپہر کا کھانا کھانے گئے تھے؟

جواب - یاد نہیں ہے۔

11- دوران ٹیٹ اپنی جو کئی سمیٹل تھے؟ بانسی سے رالہ سڈرلم پہلی تھیں کیا؟

جواب - جو کئی نہیں لگتا تھا۔ نیاز علی LHC سب سے جو کئی سمیٹل جو روزنامہ میں چھپتا تھا اور جیل ذیلی کو رہا تھا  
اس سے رالہ ہوا تھا۔ ٹائم یاد نہیں۔

12- نیاز علی LHC سے کیوں رالہ ہوا؟

جواب - وقت یاد نہیں لیکن نیاز علی LHC نے کہا کہ ISAA کا پیر چ ہے۔ 50 مہینہ فراہم سے لگانا رسم  
حوضہ شاف کو بائیں کرتا ہوں۔ تاکہ FIR درج کر لیں۔ میں نے لکھا نیاز علی LHC کو لکھا کہ پاس کر لیں۔

13- نیاز علی LHC سے آپ نے مراد سے پر حیرت تفصیلات بوجھ لیں؟

جواب - نہیں میں نے کوئی تفصیل نہیں بوجھی۔

14- مراد سے پر آپ نے دستخط کیے؟

جواب - نہیں۔

USP Legal Mardan

15- آپ ٹیٹ سے کب جو کئی پر واپس آئے؟ اور واپس آکر نیاز علی سے میرے بارے پوچھا؟

جواب - وقت یاد نہیں۔ روزنامہ میں والی ہوئی۔ نیاز علی LHC نے مجھے تفصیل بتائی کہ ریمارڈ جو ذیلی  
تیار کیا ہوا ہے اور ملزم کارکن ISAA کی عدالت میں پیش ہونے کیلئے آج حاضر

Attached

PRINCIPAL  
BUREAU OF TRAINING CENTRE  
Rawalpindi

میں کورسٹ لکھی گیا

12.09.2021  
16:01:34



OFFICE OF THE PRINCIPAL  
ELITE POLICE TRAINING CENTRE  
NOWSHERA



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No: 3851-S&EPTC Nowshera

Date 19/10/2023

To: The District Police Officer,  
Mardan

Amir I  
24

Subject: REQUEST FOR EITHER FILING CPLA AGAINST ORDER DATED 24.07.2023, PASSED IN SERVICE APPEAL NO. 620/2022 FILLED BY EX IHC ABID KHAN NO. 3293 OR INITIATING DENOVO ENQUIRY PROCEEDINGS AS DIRECTED BY TRIBUNAL.

Memo: Kindly refer to DIG Internal Accountability Branch, Khyber Pakhtunkhwa Peshawar letter No. 1459-62/CPO/LAB dated 20.09.2023 and your office letter No. 4952-60/EC dated 22.09.2023.

Denovo Enquiry Proceeding against IHC Abid Khan No. 3293, completed in all respect alongwith recommendations are forwarded herewith for further necessary action, please.

P.A / Branch  
District Police  
Officer, Mardan

Diary No: 1872/10/23

Date: 19/10/23

(Abdul Hayee) PSP, UNPM  
Principal/ Enquiry Officer  
Elite Police Training Centre  
Nowshera  
PRINCIPAL  
ELITE POLICE TRAINING CENTRE  
NOWSHERA

Encl ( 90 Pages)

Copy forwarded for information to the:-

Deputy Inspector General of Police (IAB), CPO, Peshawar.

Sir,  
May forward Finding Report  
to DIG IAB Peshawar for his kind  
review & forward me, if agreed.

DPS/AM

Issue this final SCN  
& call him in OR  
N/A  
19/10/23

PA 19/10/23

Sup Legal  
Mardan

37

25 ✓ 1

**SUBJECT: DE-NOVE ENQUIRY AGAINST IHC ABID KHAN NO. 3293**

Kindly refer to DPPO Mardan letter No 4970/EC dated 26.09.2023 **Annex-A** and DIG IAB CPO Peshawar letter No. 1459-62/CPO/IAB dated 20.09.2023 **Annex-B**. The undersigned was entrusted for de-novo enquiry in the case of IHC Abid Ali No. 3293.

Brief fact of the case is that IHC Abid Ali No. 3293 was dismissed by DPO Mardan on the charges, "That while posted as In Charge PP Shaheedan (now police line mardan) was found negligence for the irregularities, as per SDPO Rural Mardan Office letter No. 1299/R dated 07.09.2021. Copy of Show Cause is attached as per **Annex-C**. Having aggrieved with the orders, the official file appeal in Khyber Pakhtunkhwa, Service Tribunal. The Honourable Tribunal in its decision dated 24.07.2023 set aside the impugned order and direct De-novo enquiry in the matter.

**PROCEEDINGS OF THE ENQUIRY**

In order to probe into the matters and ascertain real facts DPO Mardan was requested vide this office letter No. 3685-86/EPTC/NSR dated 2.10.2023 (**Annex-D**) for issuance of Show Cause Notice. Show Cause Notice was issued to IHC Abid Khan No. 3293 vide DPO Mardan letter No. 8982/PA dated 10.10.2023 (**Annex-E**). As per statement of allegations:-

- a. On 01.09.2021, he accompanied by LHC Niaz Ali No. 2697 etc arrested one Kamran R/O Nawan Killey Toru with a 30 bore without number and unlicensed pistol and 05 rounds during routine patrolling vide case FIR No. 1057 dated 01.09.2023 U/S 15AA PS Rustam.
- b. On 02.09.2023, he (IHC Abid Khan) has prepared Remand Judicial Challan and sent it to the Court through FC Ayaz No. 1663 with advice that the accused is waiting at Mardan Katcheri. On reaching Mardan Katcheri, he found IHC Niaz Ali No. 2697 along-with accused Kamran, so he handed over the Remand Judicial papers to LHC Niaz Ai, who produced the accused to the Court wherein the accused couldn't produce any surety, so the Court fined him of Rs. 1000/-, but intentionally the accused regretted by not paying the fined amount, so he was sent to Judicial Lock-up. The main purpose behind preferring Judicial Lock-Up was that on 03.09.2021, brother of accused namely Amir Sajjad committed murder vide case FIR No. 889 dated 03.09.2021 U/S 302/324/34 PPC PS Toru, in which, he (accused Kamran) was also charged for the commission of crime.

PRINCIPAL  
AGENCY

*[Handwritten Signature]*

OSP Legal  
Mardan

PRINCIPAL  
AGENCY



*[Handwritten mark]*

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- c. As per SP/ Investigation Mardan vide his office letter No. 531/PA/Inv: dated 06.09.2021, highlighted that accused Kamran in connivance with LHC Muhammad Tariq No. 627 of PAL Office Mardan and his brother LHC Niaz Ali No. 2697 of PP Shaheedan (Now both suspended) registered the above quoted case against himself, because on the day and at the time of occurrence, accused Kamran was not present on the spot and no direct recovery has been made from him, while on the next day 02.09.2021, accused handed over to FC Ayaz Ali No. 1663 without handcuffs in the Court, wherein before the concerned Magistrate, accused Kamran resiled from his statement and was sent to Judicial Lockup mardan. From the preliminary enquiry, it has been found that accused Kamran in connivance with LHC Muhammad Tariq has planned his entrance to Mardan Jail and this fact has been accepted by all.
- d. From the above discussion, the involvement of IHC Abid Khan in this episode/ plan can't be ruled out.

*[Signature]*  
PRINCIPAL  
ELITE POLICE TRAINING CENTRE  
NDWISHERA

The charge sheet was received by IHC Abid Khan and submitted his reply to enquiry officer on 11.10.2023 (**Annex-F**). On 11.10.2023 DPO Mardan was requested vide this office letter No. 3791-92/EPTC/NSR dated 11.10.2023 (**Annex-G**) for provision of relevant record and recording statements of the officials in connection with the enquiry. Based on the reply submitted by IHC Abid Khan, statements of witnesses FC Sajjad Ahamd 2979, FC Wakeel No. 2644, FC Ayaz Ali No. 1663, ASI Khalil ur Rehman, LHC Niaz Ali and LHC Tariq of district mardan were recorded and made the part of the enquiry. Statement of IHC Abid Khan was cross examined. Statements of IHC Abid Khan and Statements of the witnesses were also crossed examined. All the statements and cross examination/ cross questions were signed from the witness.

On 13.10.2023 relevant record i.e Daily Dairy Report (**Annex-H**) and Photocopy of FIR No. 15AA / 1057 (**Annex-J**) were produced/ perused in detail. Furthermore, statements of Moharrar PP Shaheedan, HC Amjid , Muharrar PS Rustam ASI Yousaf and the then Moharrar PS Rustam ASI Zahoor were also recorded and made part of the enquiry.

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Reply/ Statement of IHC Abid Khan (**Annex-F**) is reproduced as:-

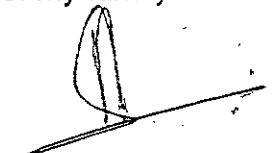
- a. That I was appointed as constable in 2007 and successfully completed courses and then transferred to Elite Force where i performed my duties with zeal and fully devotion.
- b. That, I have best service in highly appreciated and also granted commendation certificates and cash prized on best performance.
- c. That my entire service is unblemished and there is no single complain against me during my entire service.
- d. That. I was dismissed from service on 10.03.2022, on the grounds of misconduct, however, i am innocent and falsely/ intentionally implicated in the case and dismissed from service.
- e. That, dismissal order is illegal against law and facts and liable to be set aside on the following grounds.

**Grounds**

- That because I, neither scribed/ dedicated/ signed the Murasila nor I arrested the accused.
- That, because for taking judicial remand of the accused, the remand was also not signed by me and the scribed signed of mine is bogus and based on malafide and having some ulterior motives by other officials who planned this story.
- That, because I also brought these facts of fake sign etc, in the notice of Superiors but they didn't verified my signatures, and writings from any relevant expert and nor sent it to Forensic Laboratory (FSL), for matching signatures and writings.
- That, because the LHC Niaz Ali and his borther namely LHC Muhammad Tariq done all these illegal acts with due deliberations and consultations with accused Kamran without informing me and the superiors officials/inquiry officer perused the CDR of both Niaz Ali and Muhammad Tariq.
- That, because no impartial inquiry was conducted.
- That, because I was not provided opportunity of fair trial as envisaged in Article 10-A of the Constitution of Islamic Republic of Pakistan and principal of natural justice by not providing the opportunity of cross examine the accused and officials.
- That, because I having unblemished service record of about 15 years.
- That, because I was the sole bread earner of my family.

  
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**Mardan**



**Prayer:**

It is therefore humbly prayed to vanish the instant De-novo Inquiry as i was malafidely involved in the sad act being innocent.

Statement/ Reply (Annex-L) of FC Sajjad Ahmed No. 2919 is reproduced as:-

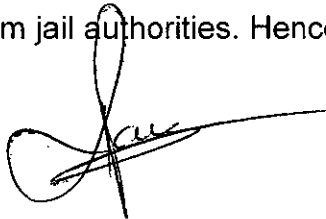
I stated that I was posted at PP Shaheedan at that time. IHC Abid Khan was the incharge and LHC Niaz Ali was Muharrar of PP Shaheedan at that time. Daily Diary was run/maintained by LHC Niaz Ali. I have no knowledge of the said FIR in which we are summoned, neither have I seen the Murassila, nor I have seen the accused. I have not signed the Challan/ Fard. Hence this is my statement and is based on truth.

Statement/ Reply (Annex-M) of FC Wakeel No. 2644 is reproduced as:-

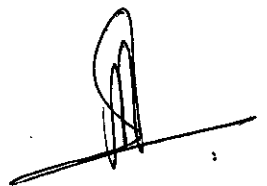
I reply the written statement that the FIR has been filed/ registered on accused Kamran just to show progress. I have neither seen the accused Kamran, in the Police Post nor have I seen the case property. I have not signed the challan/ Fard. I have no knowledge of the said FIR. Hence this is my statement and is based on truth.

Statement/ Reply (Annex-N) of FC Ayaz Ali No. 1663 is reproduced as:-

On 02.09.2023, I obtained challan from PS Rustam and submitted it to Judicial Magistrate. Meanwhile I received call from LHC Niaz Ali of PP Shaheedan, to bring missal of 15 AA in the custody of IHC Abid Khan in the name of Kamran to Katcheri. The accused will come to the Katchri. I bring the said in the notice of Muharrar staff. When I reached the Katchiri LHC Niaz Ali was present along with accused Kamran. After a while the brother of LHC Niaz Ali, IHC Muhammad Tariq also arrived at the katcheri. The accused was handed over to me to produce him before the court. The court has ordered the release of the accused upon the presentation of two guarantors; however, the accused did not produced guarantors. Then the court fined the accused for Rs. 1000/-. However the accused told that he did not have the fined amount. The court ordered to lent Rs. 1000/- from someone, however he was using delaying factics. Then I told LHC Niaz Ali to pay the fine, but he also denied. Then the court ordered to send the accused Kamran behind the bar and issued Jail warrant. Then I sent the accused Kamran to District Jail Mardan and obtained receipt from jail authorities. Hence this is my statement and is based on truth.



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Statement/ Reply (Annex-O) of ASI Khalil ur Rehman is reproduced as:-

On 01.09.2023, I ASI Khalil ur Rehman was posted on General Duty on 01.09.2023 at PS Rustam. Neither I registered FIR No. 1057 U.S 15AA dated 01.09.2023 against Kamran Khan S/O Noor Habib R/O Nawan Kalli Toru, nor I signed FIR. The murasal of 15AA had not handed over to me by LHC Niaz Ali and IHC Abid Ali.

Statement/ Reply (Annex-P) of LHC Niaz Ali No. 3333 is reproduced as:-


That I was performing duties with IHC Abid Khan at PP Shaheedan on 01.09.2023. A young man was arrested with unlicensed pistol along with 5 x rounds of ammo who disclosed his identity as Kamran Khan S/O Noor Habib R/O Nawan Kalli Toru. IHC Abid Khan sent Murasila to Police Station Rustam and FIR No. 1057 U/S 15AA dated 1.09.2021 at PS Rustam registered. On 02.09.2023 Muharrar Staff has produced the accused before the court, which is not in my knowledge because I was on Check Post/ Naka Bandi duty with IHC Abid Khan on 02.09.2021 vide DD Report No. 04 dated 02.09.2023. I have no knowledge that the accused Kamran has been released by the court or send behind the bar. On 03.09.2023 at the jurisdiction of PS Toru incident of murdered took place. Kamran S/O Noor Habib was nominated in the FIR vide No. 889 dated 03.09.2021 U/S 302/324 PS Toru. As at that time the accused Karman was behind the bar in FIR No. 1057 U/S 15AA dated 1.09.2021 PS Rustam. The Police declared the FIR of PS Rustam as pre- planed/ scripted drama and confined me to quarter guard for 06 days vide DD No. 13 dated 05.09.2021. Later on I was dismissed from service on 09.03.2022, on the pretext of an offence I did not committed. Having aggrieved on the decision I filled an instant appeal at KP Service Tribunal. The Honourable Service Tribunal set aside the impugment order and ordered for restoration of my services. I was also proved innocent in De-novo enquiry conducted by AIG Inquiry CCP Peshawar, SP Headquarter Peshawar and DSP Legal CCP Peshawar, after recording statements of the witnesses. As I am proved innocent in the De-Novo enquiry and I had did nothing wrong. As Constable I have no power to registered FIR against anyone nor can I release any one.

Statement/ Reply (Annex-Q) of LHC Muhammad Tariq No. 1608 is reproduced as:-

Stating that I was performing duties at PAL office for one year. On 05.09.2023, I was present at home and received a call from Police Line Mardan to report to Muharrar Police Line. I was confined to Quarter Guard due to FIR No. 1057 U/S 15AA dated 1.09.2021, PS Rustam was registered against Kamran, and was sent to Jail. On 03.09.2021 the accused was also nominated in FIR No. 889 dated 03.09.2021 U/S 302/324 PS Toru. I was allegedly involved in planning of registering FIR U/S 15AA for some ulterior motives. I was performing my duties at PAL Office mardan and I had no

  
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power to register FIR in PS Rustam and PS Toru and to arrest someone. I also did not know the accused Kamran, nor know about his enmity. Later on I was dismissed from service on 09.03.2022. The Honourable Service Tribunal set aside the impugment order and ordered for restoration of my services. I was also proved innocent in De-novo enquiry conducted by AIG Inquiry CCP Peshawar, SP Headquarter Peshawar and DSP Legal CCP Peshawar, after recording statements of the witnesses. Record of FIR. 889 dated 03.09.2021 U/S 302/324 PS Toru, and witnesses therein was also perused by the officer. I was proved innocent in the de-novo enquiry and the court decision was declared as per law/ merit.

Statement/ Reply (Annex-R) of LHC Amjid No. 265 is reproduced as:-

I, HC Amjid Zaman No. 265 performing General Duties at PP Shaheedan since 31.12.2021. As there is no permanent Muharrar at PP Shaheedan, therefore, documentation/ issue and receipt duties are also performed by me. The said incident was occurred 04 x months prior to my posting at PP Shaheedan. As for as Daily Dairy dated 01.09.2021 is concerned, I had checked the entire record, but did not find Daily Dairy. I along with Incharge PP Shaheedan checked the record room PS Rustam but in vain. However since my posting at PP Shaheedan all the Roznamcha Record are present in record of PP. Hence this is my statement and based on truth.

Statement/ Reply (Annex-S) of ASI Yousaf Khan is reproduced as:-

I, ASI Yousaf present Moharrar PS Rustam stating that I am performing Muharrar duties at PS Rustam since 30.05.2023. As Muharrar PS is the custodian of all the relevant record. Attested Photocopies of the decided case U/S 15AA alongwith Departure DD Report, attested photocopies of Registered No. 19 alongwith Original FIR Book is also produced herewith before the enquiry officer. Hence this is my statement.

Statement/ Reply (Annex-T) of ASI Zahoor Ahmad is reproduced as:-

I Zahoor Ahmed the then Moharrar PS Rustam stating that on 01.09.2021 at 0830 I was appeared before DSP City Mardan. And on the same date at 1700 hours I returned. My departure and arrival is present in the PS Daily Dairy. As for as the registration of FIR No. 1057 U/S 15AA dated 1.09.2021 PS Rustam is concerned, it registered before my arrival. Hence this is my statement.

*[Handwritten signature]*

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Mardan**

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**CROSS QUESTION/ CROSS EXAMINATION**

**Cross question on IHC Abid Khan No. 3293**

**Question:** When did you receive the charge sheet? From which office it is issued? Did you affix your signature on its receipt?

**Answer:** Received the Charge Sheet on 10.10.2023 from DPO office Mardan, through PA Fazal Qadir and affixed my signature on receiving slip.

**Question:** Did you read and write English? Who explain it to you?

**Answer:** I can read English, and understand a little bit. However my Class Fellow Advocate Abid explain the charge sheet.

**Question:** Who write the reply of charge sheet? And who affix the signature?

**Answer:** The reply was written by me, and I affix the signature on it.

**Question:** Where were you on 01.09.2021?

**Answer:** I was at home on a routine Shab Bashi, I did not recall the date, However proper entry has been made at Daily Diary. I return from home at morning on 01.09.2021.

**Question:** You did not fully understand the English, however your reply to the charge sheet is in English, who prepare the reply for you?

**Answer:** I prepared the reply in Urdu, and an advocate at Katchehri has translated it in English, and it is my reply.

**Question:** When did you departed for checking/ Gasht on 01.09.2021?

**Answer:** At morning, did not recall the exact time, proper entry has been made in DD.

**Question:** Who accompanied you, and was it a mobile patrolling or foot?

**Answer:** I went on private vehicle towards PS Rustam for patrolling. No one was with me.

**Question:** When you went on patrolling from PS Rustam, was it mobile patrolling or foot and who accompanied you?

**Answer:** It was mobile patrolling round about 0900 to 1000 hrs. Did not remember about the officials.

**Question:** Where did you conduct mobile patrolling?

**Answer:** At Rustam Bazar, Nawan Kalli, Mouta, Sheren Khan Chawk and Shaheedan Kalli etc.

**Question:** Where did you have your lunch?

**Answer:** I do not remember.

**Question:** Did you go to PP Shaheedan during patrolling, or did you contact anyone?

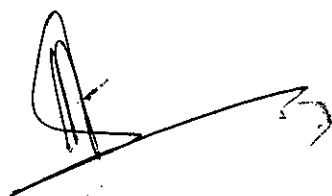
**Answer:** I did not go to PP, but I contacted LHC Niaz Ali who was on General Duty and also maintaining the Daily Dairy. Did not remember the time.

**Question:** Why did you contact LHC Niaz Ali?

**Answer:** Did not remember the time, but LHC Niaz Ali told me regarding 15AA FIR. He was going to pass it on my behalf to Muharrar staff PS Rustam for registering FIR and I replied him to pass the same.

**Question:** Did you asked detail form LHC Niaz Ali regarding challan/ FIR?

**Answer:** No.



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**Question:** Did you affixed your signature on Murasalla.?

**Answer:** No.

**Question:** When did you return from Mobile Patrolling, and did you asked any detail from LHC Niaz Ali?

**Answer:** Did not remember the time. Entry has been made at DD. Niaz Ali told me that Remand Judicial has been prepared and the accused Kamran will come to appear before the court by tomorrow.

**Question:** Did the accused was present in the PP?

**Answer:** I did not see him at PP.

**Question:** Did you read case FIR No. 1057 dated 01.09.2021 U/S 15AA against Karman?

**Answer:** I did not remember regarding Case FIR nor Judicial Remand.

**Question:** What does recover in this case?

**Answer:** No recovery has been made.

**Question:** Who sealed the parcel?

**Answer:** There was no parcel, it was a progressive case. Nothing was recovered on the spot; normally the Police file such progressive cases. License has been obtained from the friends and registered the case.

**Question:** Did it was a progressive FIR?

**Answer:** Yes

**Question:** Why you did not affixed your signatures on Muraslla, despite you allow LHC Niaz Ali to pass the FIR?

**Answer:** As I told earlier. It is a practice in the Police Stations that Name of the accused is passed through Wireless Set or mobile phone and FIR is registered. Niaz Ali affixed my signatures on the murasla and told me that I had affixed your signatures, and prepared Judicial Remand.

**Question:** Who produced the accused Kamran before the court?

**Answer:** FC Ayaz has brought the Judicial Remand documents to the court, and was in contact with LHC Niaz Ali.

**Question:** What happened next?

**Answer:** Latter on FC Ayaz told me that the LHC Niaz Ali alongwith accused Kamran reached the court. Brother of Niaz Ali LHC Tariq also reached the court. The Honourable Judge has fined the accused Kamran for Rs. 1000/-. The accused Kamran was reluctant to pay the dues, nor did he produce any guarantor. The Honourable Judge has ordered to send the accused Kamran to Jail. FC Ayaz has sent the accused Kamran to the jail in hand cuffs.

**Question:** The accused Kamran fall in which Police Station, and where did FIR of 15AA registered?

**Answer:** He is the resident of PS Toru Mardan. Case FIR of 15AA was registered at PS Rustam.

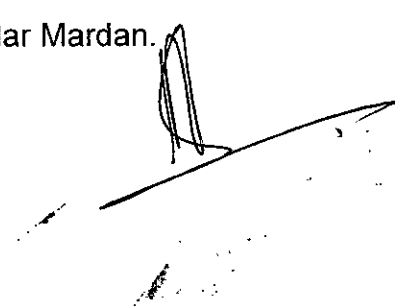
**Question:** Your local Police Station name?

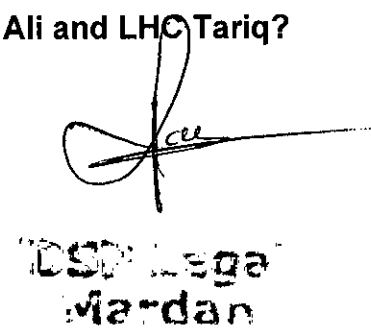
**Answer:** PS Jabbar Mardan.

**Question:** Local Police Station name of LHC Niaz Ali and LHC Tariq?

**Answer:** PS Saddar Mardan.

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**Question:** When did and where the murder occur, in which Kamran was nominated?

**Answer:** The murder occur on 3.10.2023 or 4.10.2023, FIR has been registered at PS Toru.

**Question:** When did you know about the FIR?

**Answer:** On 5.09.2021 or 6.09.2021, when SP Investigation message me to appear before him.

**Question:** What did you do, when you knew about the FIR against Kamran?

**Answer:** I narrated the same story to SP Investigation.

**Question:** What amount did you receive upon registering the bogus FIR of 15AA?

**Answer:** I did not receive any amount.

**Question:** What amount did LHC Niaz Ali give to you?

**Answer:** I did not receive any amount.

**Question:** Did you know the accused Kamran or his relative?

**Answer:** No.

**Question:** When you were dealt with departmentally and dismissed, did you take any action against Niaz Ali?

**Answer:** I did nothing against Niaz Ali, however I told him and his father that I will dealt with them as per Pushto tradition at Jirga.

**Question:** Did you file any complain against Niaz Ali to high-ups.

**Answer:** No.

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QUESTION / ANSWER ON FC SAJJAD 2979 DISTRICT MARDAN

**Question:** Who was maintaining Daily Dairy at PP Shaheedan?

**Answer:** LHC Niaz Ali.

**Question:** Where were you posted on 01.09.2021?

**Answer:** General Duty at PP Shaheedan, Police Station Rustam.

**Question:** Where was Incharge PP IHC Abid Khan on 01.09.2023?

**Answer:** I did not remember.

**Question:** How many time you spent at PP on 01.09.2021?

**Answer:** I was present at PP for the whole day.

**Question:** Did you know the accused Kamran?

**Answer:** No.

**Question:** Did IHC Abid Khan arrest anyone on 01.09.2021?

**Answer:** I did not remember.

**Question:** Who arrested the accused Kamran, and what did recover from him?

**Answer:** I did not know.

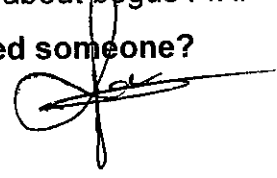
**Question:** Did you know anything regarding 15AA or murdered case?

**Answer:** When IHC Abid Khan was dismissed, i knew about bogus FIR.

**Question:** Did LHC Niaz Ali issued any FIR or arrested someone?

**Answer:** I did not know.






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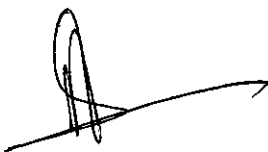
QUESTION / ANSWER ON FC WAKEEL 2644 DISTRICT MARDAN

- Question:** Who was maintaining Daily Dairy at PP Shaheedan?  
**Answer:** LHC Niaz Ali.
- Question:** Who was preparing documents of Judicial Remand?  
**Answer:** LHC Niaz Ali.
- Question:** Where was Incharge LHC Niaz Ali on 01.09.2023?  
**Answer:** I did not remember.
- Question:** Where were you posted on 01.09.2021?  
**Answer:** At PP Shaheedan, Police Station Rustam.
- Question:** What did you know about the entire story of 15AA and Misal Muqadima?  
**Answer:** LHC Niaz Ali has told IHC Abid Khan that it is not a progressive case, and IHC Abid Khan told him to issue the FIR.
- Question:** Did you sign the Pert?  
**Answer:** No.
- Question:** Did you know the accused Kamran?  
**Answer:** I did not know.
- Question:** What amount did you receive?  
**Answer:** I did not receive any amount.

  
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QUESTION / ANSWER ON FC AYAZ 1663 DISTRICT MARDAN

- Question:** Who told you regarding judicial remand?  
**Answer:** LHC Niaz Ali has told me on telephone to obtained missal from IHC Abid "MUTHA" and brings it.
- Question:** Did the accused Kamran was present you reached the court?  
**Answer:** When I reached the court and contacted LHC Niaz Ali, he told me that he is also coming and later he came with the accused Kamran.
- Question:** Did you produce the accused before the court?  
**Answer:** LHC Niaz Ali told me to produced the accuse before the court and I produced the accused before the judicial magistrate.
- Question:** What did happened next?  
**Answer:** The court has accepted the bail of the accused based on production of two guarantors of fifty thousand rupees. However the accused did not produced guarantors. Then the court fined the accused for Rs. 1000/-. The accused was reluctant to pay the fine. I told LHC Niaz Ali to pay the fine as he was accompanied with him. Then I obtained orders from the court and submit the accused at Mardan Jail.
- Question:** Did IHC Abid Khan know about the case?  
**Answer:** I did not know.
- Question:** Did IHC Abid Khan give you any directions?  
**Answer:** No.





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**Question:** Did IHC Abid Khan was present at PP on 02.09.2021.

**Answer:** I did not saw him.

**Question:** Did you know the accused Kamran before or saw him at PP.

**Answer:** No. I saw him during appearance before the court.

**Question:** Who was accompanied with, when LHC Abid Ali brings the accused Kamran to the court?

**Answer:** After sometime brother of LHC Niaz Ali, LHC Tariq also came to the court.

**QUESTION / ANSWER ON ASI KHALIL UR REHMAN DISTRICT MARDAN**

**Question:** Did you affix your signature on case FIR No. 1057 dated 1.09.2021 U/S 15AA PS Rustam?

**Answer:** No

**Question:** Where were you posted on 01.09.2021?

**Answer:** I was posted at PS Rustam, however I didn't remember where does I was.

**Question:** Who affixed signature on FIR?

**Answer:** I did not know.

**Question:** What did you know about the case 15AA?

**Answer:** I only know that it was a bogus case, and may passed on mobile phone.

**Question:** Did IHC Abid, LHC Abid Ali or LHC Tariq discussed anything with you about the case.

**Answer:** No.

**Question:** Did you know the accused Kamran?

**Answer:** No.

**Question:** Did you write the FIR No. 1057 U/S 15AA.

**Answer:** No.

**QUESTION / ANSWER ON LHC NIAZ ALI DISTRICT MARDAN**

**Question:** Where were you on 01.09.2021?

**Answer:** I was present at PP Shaheedan PS Rustam.

**Question:** Where were you on 02.09.2021?

**Answer:** I was at Nakabandi/ Check post in front of PP Shaheedan alongwith IHC Abid Khan.

**Question:** Did you know the accused Kamran before?

**Answer:** No.

**Question:** Did you contact with the accused Kamran on phone?

**Answer:** No.

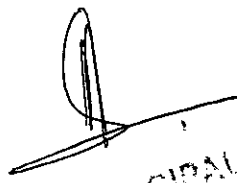
**Question:** Did you arrest the accused Kamran in front of PP?

**Answer:** I did not arrest the accused Kamran, however IHC Abid Khan has arrested the accused the Kamran.

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- Question:** Did you prepare documents of Judicial Remand of the accused Kamran?  
**Answer:** No.
- Question:** Were you were present with the accused Kamran at court?  
**Answer:** No.
- Question:** Did you brother LHC Tariq visited the court?  
**Answer:** I did not know, as I was on Nakabandi in front of PP Shaheedan.
- Question:** Did your brother LHC Tariq remain MM at PS Toru mardan.  
**Answer:** Yes.
- Question:** Did you know about friendly relations of your brother LHC Tariq with the accused Kamran, and they contacted on phone?  
**Answer:** I did not know.
- Question:** Where were LHC Tariq performing duties?  
**Answer:** At PAL office mardan.
- Question:** Why LHC Tariq has been involved in the enquiry.  
**Answer:** I did not know.
- Question:** Where was IHC Abid Khan on 01.09.2021?  
**Answer:** PP Shaheedan PS Rustam.
- Question:** On that day did IHC Abid went on Patrolling from PS Rustam.  
**Answer:** Yes, but IHC Abid Khan came back to PP round about 1145 to 1200.
- Question:** Who chalked the Murasila 15AA against the accused Kamran, and who affixed his signature?  
**Answer:** I did not chalked the Murasilla, nor I affixed the signature.
- Question:** Who prepared the remand documents?  
**Answer:** I did not know.
- Question:** Did you know FC Ayaz Ali No. 1663?  
**Answer:** Yes I knew he is performing duties in Police.
- Question:** Where was FC Ayaz Ali posted at that time?  
**Answer:** PS Rustam.
- Question:** Where were you posted at that time?  
**Answer:** General Duties at PP Shaheedan.
- Question:** Who were Moharrar PP Shaheedan at that time?  
**Answer:** No one, every one maintaining DD including mine.
- Question:** Who did case FIR 15AA was registered against the accused Kamran?  
**Answer:** I did not know, IHC Abid Khan is responsible for it.
- Question:** When and where did murdered case registered against accused Kamran?  
**Answer:** On 03.09.2021 at PS Toru.
- Question:** How did you know regarding murdered case?  
**Answer:** During enquiry.

  
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 TORU MARDAN

  
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**Question:** How much amount you and your brother received from accused Kamran?

**Answer:** Nothing.

**Question:** How much amount did IHC Abid Khan received?

**Answer:** I did not know.

**Question:** On 01.09.2021 what kind of duty you perform?

**Answer:** Nakabandi at the front of PP Shaheedan from 0830 to round about 1200 hrs.

**Question:** Where IHC Abid Khan did arrested the accused Kamran?

**Answer:** Somewhere out the PP, and did not bring to Police Post.

**Question:** Did you talked with Muharrar Staff of PS Rustam regarding 15AA case?

**Answer:** No.

**QUESTION / ANSWER ON LHC TARIQ DISTRICT MARDAN**

**Question:** Did you know the accused Kamran?

**Answer:** No

**Question:** Did you have any contact with accused Kamran on mobile phone?

**Answer:** My be, I was MM at PS Toru.

**Question:** Did you have any contact with accused Kamran on after or before 01.09.2021

**Answer:** May be, but I don't remember.

**Question:** Did you meet or contacted IHC Abid Khan before 01.09.2021?

**Answer:** Yes I knew IHC Abid Khan, maybe we meet, however we did not contact on phone.

**Question:** Did you went the court alongwith the accused Kamran on 02.09.2021?

**Answer:** No.

**Question:** Did you know FC Ayaz Ali 1663?

**Answer:** Yes, he is my batch mate.

**Question:** Did you meet with FC Ayaz??

**Answer:** Yes

**Question:** Did you brother serving or served in Police department?

**Answer:** Yes, LHC Niaz Ali is my brother.

**Question:** Where were LHC Niaz Ali posted on 01.09.2021?

**Answer:** At PP Shaheedan PS Rustam.

**Question:** Where were FC Ayaz Ali posted on 01.09.2021?

**Answer:** I did not know.


**Question:** Where were IHC Abid Ali posted at that time?

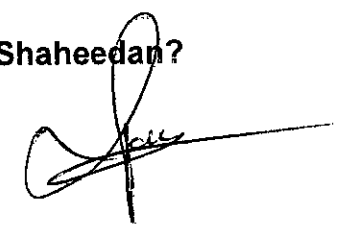
**Answer:** He was Incharge PP Shaheedan.

**Question:** What was the posting of LHC Niaz Ali at PP Shaheedan?

**Answer:** General Duty.

  
POLICE TRAINING

  
LHC Tariq  
District Mardan

  
LHC Tariq  
District Mardan

**Question:** Why were you gone to the court on 02.09.2021 when the accused Kamran was appeared before the court.

**Answer:** I did not go.

**Question:** Why were you dismissed from the services?

**Answer:** I was confined to quarter guard and then dismissed from the services, due to 15AA case on the accused Kamran.

**Question:** How much amount you received from accused Kamran?

**Answer:** Nothing, nor give any amount to IHC Abid Khan.

**QUESTION / ANSWER ON HC AMJID ZAMAN 265 DISTRICT MARDAN**

**Question:** When were you posted at PP Shaheedan?

**Answer:** Since 31.12.2021.

**Question:** Why you did not produced the record of 01.09.2021?

**Answer:** The record is not present at PP.

**Question:** What is the detailed regarding 15AA case against accused Kamran?

**Answer:** As far as I knew, that IHC Abid Khan has registered an FIR, and he was suspended. Before it IHC Abid Khan was MM PS Rustam, and I was posted at PP Batroch PS Rustam. I know IHC Abid before it.

**QUESTION / ANSWER ON ASI YOUSAF KHAN DISTRICT MARDAN**

**Question:** When were you posted at PS Rustam?

**Answer:** Since 30.05.2023 Muharrar PS Rustam.

**Question:** What was recovered in case FIR 1057 U/S 15AA, at what serial number it is written in Registered 19?

**Answer:** Unlicensed 30 bore Pistol was recovered. Entry has been made at Register No. 19 at serial No. 988. Attested photocopies have also produced herewith.

**Question:** Did original FIR No. 1057 is available at register No. 01.

**Answer:** Yes available at Register No. 01. Attested photocopies have also produced wherewith for perusal.

**Question:** Did IHC Abid Khan has served with you before, and you recognized his signatures?

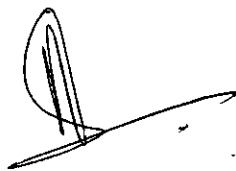
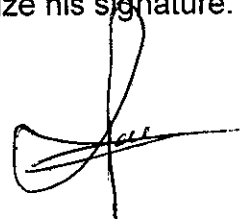
**Answer:** No.

**Question:** Who affixed the signatures on registering FIR?

**Answer:** ASI Khali ur Rehman.

**Question:** Did you know ASI Khalil ur Rehman, and know is signature?

**Answer:** I know ASI Khalil ur Rehman, but did not recognize his signature.

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**QUESTION / ANSWER ON ASI ZAHOR AHMAD DISTRICT MARDAN**

**Question: What were your posting at PS Rustam?**

Answer: When this incident occur and IHC Abid Khan incharge PP Shaheedan sent the murasala, I was performing duties of Muharrar PS Rustam. I was posted as Muharrar 2/3 months before it.

**Question: Did you see the Murassla sent by IHC Abid Khan?**

Answer: No.

**Question: Did IHC Abid Khan visit PS on 01.09.2021?**

Answer: I did not remember.

**Question: Who bring the Murassila written by IHC Abid, and who registered the FIR No. 1057?**

Answer: LHC Niaz Ali has brought the Murassila, and the FIR was registered by ASI Khalil ur Rehman.

**Question: As a Muharrar did you report arrival of LHC Niaz Ali and Murasilla at DD.**

Answer: I had made the arrival on 01.09.2021 at 1610 and 1620 vide DD No. 24-25.

**Question: Did you recognize signature of ASI Khalil ur Rehman?**

Answer: I did not remember.

**Question: Who was the accused in 15AA, and what did recovered from him?**

Answer: Kamran S/O Noor Habib R/O Nawa Kalli, Toru Mardan. Pistol 30 bore without number and 5 ammunitions were recovered. However, the recovery was not brought with Murasila.

**Question: Recovery was handed over to you?**

Answer: On 18.01.2022 handed me unlicensed 30 bore pistol with fixed charger alongwith 5 rounds.

**Question: Did the recovery were sealed in parcel?**

Answer: No.

**Question: When the murasilla was sent to PS, did anyone contacted you from PP Shaheedan, or told you about the incident.**

Answer: No.

**Question: Did the accused Kamran was brought to PS Rustam?**

Answer: No.

**Question: Did you know the accused Kamran?**

Answer: No.

**Question: Who investigated case FIR 1057 u/s 15AA?**

Answer: IHC Abid Khan.

**Question: When complete challan regarding the case was sent, and who affix the signatures on it?**

Answer: On 30.09.2023 complete challan was sent from SHO Khaista Rehman.

*[Signature]*  
POLICE STATION  
MARDAN

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**FINDINGS FROM THE STATEMENTS BY THE ENQUIRY OFFICER**

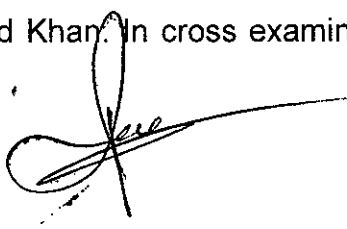
1. In cross examination of IHC Abid Khan said that he was called from PS Rustam for patrolling. During the patrolling LHC Niaz Ali called to him via mobile and informed him about FIR of 15AA and ask for permission to pass the FIR to PS Rustam, which was allowed by him. He further said that that it was a progressive case, and in such case no accused is arrested on the spot, nor direct recovery is made on the spot. Information regarding accused and recovery made thereof is passed on mobile phone to Muharrar staff of concerned Police Station, and FIR is registered. He did not ask any information from LHC Niaz Ali, nor did he affix any signature on the Misal. Niaz Ali himself signed all the documents. IHC Abid Khan also denied any relationship with the accused Kamran. In cross question he told that I had already told all the information to SP Investigation Mardan. However, he did not file any application/ complaint against LHC Niaz Ali.

2. FC Sajjad Ahmad No. 2979 in his statement told that he was present at PP Shaheedan on 01.09.2023. He disclosed that he did not see the accused Kamran at PP, nor he knows regarding any case. Later on when IHC Abid Khan was dismissed form services he came to know about the bogus FIR.

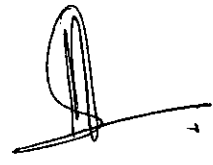
3. FC Ayaz Ali No. 1663 disclosed in cross examination that he bring Remand paper on to Court on the directions of LHC Niaz Ali. On arrival at court he contacted LHC Niaz Ali and in while Niaz Ali came to the court along with the accused Kamran. Later his brother LHC Tariq also came to the court. The accused Kamran was presented before the Judge obtained the Judicial Remand Warrant and sent him to jail.

4. ASI Khalil ur Rehman also denied affixing his signature on the on FIR 1057 US 15AA. He was not aware of registering FIR, however he accept the fact that 15AA bogus case was passed on mobile phone.

5. LHC Niaz Ali 3333 in his detailed statement stated that he was present on duty with IHC Abid Khan, that the accused Kamran was arrested with 30 bore unlicensed pistol and 05 rounds ammunition. The accused Kamran was arrested on the spot and IHC Abid Khan sent the Murasilla to PS Rustam. In cross examination LHC Niaz Ali stated that he was present on Naka Bandi in front of PP Shaheedan when the accused Kamran was arrested by IHC Abid Khan. However, he denied his visit to court on 02.09.2023. In cross examination he stated that FC Ayaz Ali 1663 was posted at PS Rustam. He denied his Muharrar duty at PP Shaheedan. He stated that he was performing duties in front of PP alongwith IHC Abid Khan. In cross examination he stated that IHC Abid Khan has arrest



**Deputy Legal Officer  
Mardan**



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the accused Kamran somewhere outside the PP, however in written statement he accepted that the accused Kamran has been arrested in his presence.

6. LHC Tariq in cross examination stated the he is the batch mate of FC Ayaz No. 1663, which show that they know each other. He also did not give any clear statement regarding his relations with the accused Kamran.

7. HC Amjid Zaman No. 265 stated that he just know that IHC Abid Khan has been suspended by on registering bogus FIR.

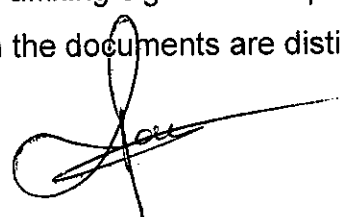
8. ASI Yousaf is cross examination stated that case property (30 bore pistol and 05 rounds) of FIR No. 1057/21 U/S 15AA is present in PS Malkhana. Proper entry has been made in Register No. 19. FIR has been registered by ASI Khalil ur Rehman.

9. Zahoor Ahmed the then Moharrar PS Rustam stated that he didn't remember his statement. Later on he stated that at the time of registering FIR he was appeared before DSP City Mardan. However in cross examination he stated that the Murasilla of 15AA was brought by LHC Niaz Ali to PS Rustam. He further stated that he made entry into DD vide No. 24-25 dated 01.09.2021 at 16:10-16:20 of registering FIR and stated that ASI Khalil Ur Rehman affixed his signature. The murasilla was against the accused name was Kamran S/O Noor Haibid R/O of Toru, however he did not receive case property on the spot. Later on IHC Abid Khan handed over case property to ASI Yousaf on 18.01.2023. Proper entries have been made in the relevant register to complete the record.

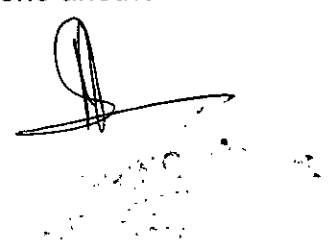
#### FINDINGS BY THE ENQUIRY OFFICER

After perusal of the relevant record, going through to the statements of the witnesses and cross questions/ examination following facts comes to the surface:-

1. On 01.09.2023 at 16:10 hrs case FIR No. 1057 U/S 15AA was registered against Kamran S/O Noor Haibid R/O of Toru on the Murasilla of IHC Abid Khan. The accused was arrested and 30 bore pistol unlicensed and 05 rounds were recovered from him. Time 1530 and spot PP Shaheedan was written on the murassila. Murasilla was written by IHC Abid with his signatures. Crime scene/ Naqsha Moqa were also prepared by IHC Abid Khan with affixing signature. Signature and statements of LHC Niaz Ali and FC Wakeel 2644 are affixed on recovery memo/ fard maqboozgi. All the relevant documents have signed by IHC Abid Khan. It is strange that neither Abid Khan nor Niaz Ali is taking the responsibility for affixing signatures. Upon careful examination, it becomes evident that all the signatures on the documents are distinct from one another.



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Mardan





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2. IHC Abid Khan admitted in his statement during cross-examination that he was aware of FIR No. 1057-21 U/S 15AA, and LHC Niaz Ali informed/passed the information to PS Rustam after obtaining telephonic approval. The question still remains unanswered as to why and how the resident of Nowan Kali Toru came to Police Post Shaheedan with an unlicensed 30-bore pistol. IHC Abid Khan admitted in his statement that, while on patrolling duties, LHC Niaz Ali had called him and suggesting registering a bogus FIR in order to show progress. IHC Abid Khan has confessed to committing the act of registering a bogus FIR, which constitutes a crime in itself.

3. Similarly, in his initial statement, LHC Niaz Ali stated that they apprehended the accused Kamran with an unlicensed 30-bore pistol during a routine check in front of Police Post Shaheedan, yet during cross-examination, he denied his earlier statement. There are significant discrepancies between his initial statement and his testimony during cross-examination. Furthermore, his brother LHC Tariq also admitted that he remained MM at Police Station Toru.

PRINCIPAL  
SUPERVISOR  
POLICE STATION  
TORU

4. The key witness FC Ayaz Ali admitted in both his statement and cross-examination that he received directions from LHC Niaz Ali to bring the Misal Miqaddima and Remand Judicial. Upon arrival at the Court, LHC Niaz Ali and the accused Kamran were present, with all instructions being issued by LHC Niaz Ali. Meanwhile, LHC Tariq also arrived at the court. When the court ordered the production of two guarantors, they willfully did not produce them, as the production of guarantors was not an impossible task to LHC Niaz Ali and LHC Tariq. Likewise, when the court imposed a fine of Rs. 1000/- on the accused Kamran, he chose to go to jail instead of paying the fine.

5. Based on the aforementioned facts, it becomes evident that the entire scheme was orchestrated with the clear motive of imprisoning the accused Kamran in order to serve certain ulterior motives. The arrest of accused Kamran far from his home, the filing of a bogus FIR under 15AA, the presence of different signatures of IHC Abid Khan on all the documents, the suspicious statements of Muharrar ASI Zahoor Ahmad, the false statements of ASI Khalil ur Rehman, and his denial of the signature on the case all seem to compose scenes of a pre-planned drama. The statements and cross-examinations of LHC Niaz Ali are also inconsistent and contentious.

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**CONCLUSION BY THE ENQUIRY OFFICER**

After reviewing the previous enquiry file and relevant records, carefully perusing/ studying the statements of the witnesses and cross-examinations, and considering the principles of justice, the following conclusions have been drawn as an inquiry officer.

1. The case FIR No. 1057, dated 01.09.2021, under section 15AA is bogus/ baseless and contrary to the facts.
2. The motive behind registering the FIR under section 15AA seems pre-planned, aiming to provide a safe passage to the accused Kamran in the case FIR No. 889 under sections 302/324, dated 03.09.2021, at PS Toru.
3. The main architects of the plan were LHC Niaz Ali and his brother LHC Tariq, who later included IHC Abid Khan in the scheme. Despite being aware of all the facts, IHC Abid Khan remained a part of the plan, providing benefits to the accused Kamran and contributing to the massacre of justice.
4. ASI Khalil ur Rehman and ASI Zahoor are giving false statements and intentionally enabling a safe passage for IHC Abid, LHC Niaz Ali, and LHC Tariq indirectly.

  
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NOWSHERA

  
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**RECOMMENDATIONS BY THE ENQUIRY OFFICER:-**

Forgoing in view the above following action is recommended:-

1. Stringent departmental action should be taken against HC Niaz Ali and LHC Tariq to set an example for other police personnel. This would discourage involvement in similar deceptive activities, ensuring the prevalence of justice.
2. Major Punishment of IHC Abid Khan No. 3293 is recommended to be intact.
3. Departmental action is also recommended against ASI Khalil ur Rehman and ASI Zahoor for attempting to conceal the facts and mislead the enquiry officer.
4. Given that the registration of a false FIR and shielding any accused from punishment is a criminal act in itself, IHC Abid Khan, LHC Niaz Ali, and LHC Tariq are also to be dealt with in accordance with the Pakistan Penal Code separately.
5. Report of De-novo enquiry is submitted for perusal, please.

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**(Abdul Hayee)PSP, UNPM**  
Principal/ Enquiry Officer.  
Elite Police Training Centre  
Nowshera

**PRINCIPAL**  
ELITE POLICE TRAINING CENTRE  
NOWSHERA

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**DSP Legal**  
**Mardan**

سوال - کیا مڈم جوڑا میں جوڑا لگا؟  
 جواب - مڈم کو میں نے اپنا دکھا۔

سوال - صل حدیث 1057 حرمہ 01-9-21 ص 1588 نام کاران آج نے پڑھ لی تھی؟  
 جواب - مجھے یاد نہیں ہے کہ قتل حدیث میں نے دیکھی تھی یا نہیں۔ جوڑا میں اپنا دکھا گیا یاد نہیں

سوال - اس حدیث میں کیا برآمد ہوا تھا؟  
 جواب - برآمد ہوئی تھی۔

سوال - پارسل کرنے سے کیا ہوا تھا؟  
 جواب - اس میں پارسل نہیں ہونا۔

سوال - ہم پولیو والے بولے تھے، یاد دوسروں سے لاشوں کے کر پڑے دیے ہیں۔  
 جواب - ہاں یہ بھی پڑا کر لیا گیا تھا۔

سوال - کیا یہ بھی پڑا کر لیا گیا تھا؟  
 جواب - ہاں یہ بھی پڑا کر لیا گیا تھا۔

Principal  
 10/10/2023

سوال - حرمہ پر دستخط نہیں آئے؟  
 جواب - نہیں دیا گیا۔

سوال - حرمہ کی تباہی کے بعد کیا ہوا؟  
 جواب - حرمہ کی تباہی کے بعد حرمہ کی تباہی ہو گئی۔

سوال - حرمہ کی تباہی کے بعد کیا ہوا؟  
 جواب - حرمہ کی تباہی کے بعد حرمہ کی تباہی ہو گئی۔

سوال - حرمہ کی تباہی کے بعد کیا ہوا؟  
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سوال - حرمہ کی تباہی کے بعد کیا ہوا؟  
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PRINCIPAL  
POLICE TRAINING CENTRE  
12-10-23

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OFFICE OF THE PRINCIPAL  
ELITE POLICE TRAINING CENTRE  
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No. 3791-92 EPTC/NSR/

Date 11/10/2023

To : The District Police Officer,  
Mardan

Subject: **REQUEST FOR EITHER FILING CPLA AGAINST ORDER DATED 24.07.2023,  
PASSED IN SERVICE APPEAL NO. 620/2022 FILLED BY EX IHC ABID KHAN  
NO. 3293 OR INITIATING DENOVO ENQUIRY PROCEEDINGS AS DIRECTED  
BY TRIBUNAL**


Memo:

Kindly refer DIG Internal Accountability Branch, Khyber Pakhtunkhwa Peshawar letter No. 1459-62/CPO/LAB dated 20.09.2023.

It is submitted that the undersigned has been nominated to conduct denove enquiry against the **IHC Abid Khan No. 3293** in the subject case. In this regard following officials as per detail are required to record their statements on 12 October 2023 at 11:00 am before the undersigned.

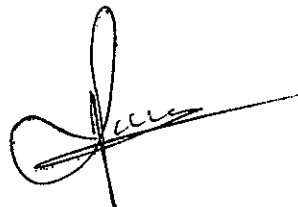
1. Officials Detail on patrolling duties/ eye witness in FIR No. 1057 dated 01.09.2021 U/S 15AA PS Rustam.
2. DD Report regarding arresting / lockup of the accused of the Said FIR.
3. FC Ayaz No. 1663, who submitted challan in the Courts.  
Mobile Number 03420974692.
4. DD Report of Challan Departure (روانگی)
4. ASI Khalil ur Rehman/ Mobile No: 03469368134
5. LHC Niaz Ali No. 2697/ 3333 Mobile No: 03117675993
6. LHC Tariq Ali No. 1608/ 627
7. IHC Abid Khan No. 3293 Mobile No: 03435491598.
8. FC Ayaz Ali No. 1673 Mobile No. 03438388976.
9. FC Sajad Ahmad No. 2979 mobile No. 03025132135.

It is therefore requested that the above-mentioned witnesses may kindly be directed to appear before the undersigned alongwith relevant record in order to complete the Denove Enquiry.

  
PRINCIPAL  
EPTC Nowshera

Copy forwarded for Information to the:-

DIG of Police Internal Accountability Brach, CPO, Peshawar.



DSP Legal  
Mardan

بیان ایزان یوسف خان آئی ڈی خالد عرفان رقم (49)

یوسف خان آئی ڈی خالد عرفان رقم نے بیان کیا کہ وہ 30-5-2023 سے تا حال عرفان رقم میں بحالت عجز و طویل سرائیخام رہے، عرفانوں چونکہ وہ بھارتی عرفان کے پاس بیٹا بیٹا کے ہمراہ رہا وہ عرفان شدہ قتل پولیس فوٹو اسٹیشن Alled سندھ عہدہ 1057 رقم ISAA 21 سے روزانہ پان سو انیس حد تک رجسٹرڈ 19 کا Alled فوٹو اسٹیشن لا کر پتہ کی جگہ اصل روزانہ FIR بنا۔ رجسٹرڈ 19 اور قتل پولیس ہی گورنمنٹ دفعہ لید کر کے یہ سہا بیان ہے

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DSP Legal Mardan

یوسف خان آئی ڈی خالد عرفان رقم

XX: آپ عرفان رقم میں کب سے لکھتے ہیں؟  
ج: 30.5.2023 سے عرفان رقم لکھتے ہوئے

س: عہدہ 1057 رقم ISAA میں کیا چیز برآمد ہوئی؟ رجسٹرڈ 19 میں کس سلسلہ نمبر؟  
ج: لیٹول 30 بوز بعد نمبر، بعد لائن برآمد ہو کر۔ رجسٹرڈ 19 میں درج ہے۔ سلسلہ نمبر 988 بر در ہے۔ رجسٹرڈ 19 کا attested فوٹو اسٹیشن آپ کو پیش کیا ہے۔

س: رجسٹرڈ میں اصل FIR عہدہ 1057 کی کیا موجود ہے؟  
ج: اصل FIR رجسٹرڈ میں موجود ہے۔ attested کاپی آپ کو دے دیا ہے۔  
س: دراصل افریقہ عہدہ کی attested لفوٹو کی آپ کے حوالے کر دیا میں۔  
س: عہدہ 1057 کے ساتھ کیا ہے؟ کیا اس کے دستخط لکھائے ہو؟  
ج: نہیں رہا۔ نہیں لکھنا۔

ATTESTED *[Signature]*  
INVESTIGATING OFFICER  
POLICE TRAINING CENTRE  
Mardan

PTD 10/13

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میں سے FIR پر جاگیدگی نہ ہو کہ نہ دستخط ہو

2- ضلع الرحمن آسی سے ہیں -

سے - ضلع الرحمن آسی کو لکھتے ہیں - دستخط ہو جائے

2- ضلع الرحمن آسی کو خاستا ہوگی۔ لیکن دستخط ہو جائے

Principal  
Elite Police Training Centre  
13-10-23

الدین محمد

جوین خان آسی

13-10-23

سن 2023  
نمبر 13-10-23

جو

DSP Legal  
Mardan

بیان اذان مسجد احمد 2979 صحنہ چونی غونڈو

(51)

قریب خود بیان کرتا ہوں کہ میں اس وقت چونی شہر میں  
 تھیں تھا۔ اے اے سلطان بھادرا انجان تھا اور نیاز علی اے اے چونی  
 اور روزنا صاحبہ نیاز علی اے اے طرانا تھا۔ جب اہل حق نے یہ لہر چھو دیا ہے۔  
 جس میں ہمیں بھلا رہا ہے۔ مجھے اس کے بارے میں کوئی معلومات نہیں  
 ہے۔ کہ اس میں کس آ رہا ہے۔ مجھے اس کے بارے میں کوئی علم نہیں ہے۔ نہ  
 میں اس کو دیکھا ہے۔ نہ ملنے کو دیکھا ہے اور نہ فرد وغیرہ پر میں نے دستخط  
 کیا ہے۔ یہی میرا بیان ہے جو کہ صحیح ہے۔

محمد احمد  
 محمد احمد

مسجد احمد 2979

12-10-2023

Principal  
 SITE POLICE TRAINING CENTRE  
 NOWSHERA

12-10-23

XXX عابد کو گواہ میرا اس کا موقع دیا جائے۔

سوال - جو کہ سفیدال میں روزنامہ کون چلانا تھا؟  
 جواب - نیاز علی اے اے

سوال - آج 01-9-2021 کو کھانہ ڈیوٹی تھی؟  
 جواب - جو کہ سفیدال کھانا رستم - ظفر ڈیوٹی 9D تھی۔

سوال - 01-9-21 کے دن عابد اے اے انجانہ جوئی کھانہ پر لگا؟  
 جواب - یاد نہیں ہے۔

سوال - عرصہ 01-9-21 کو آج کتنا وقت - جوئی پر موجود تھے؟  
 جواب - میں پورا دن صبح سے شام تک جوئی پر موجود تھا۔

سوال - کیا ملزم کا فریڈ کو آج جاننے میں؟  
 جواب - نہیں۔

سوال - عرصہ 01-9-21 کو عابد اے اے انجانہ جوئی کی کو گرفتار کیا گیا؟  
 جواب - صحیح یاد نہیں۔

سوال - ملزم کا راج کو کس نے گرفتار کیا اور اس سے کیا برآمد ہوا تھا؟  
 جواب - میں نہیں جانتا اور نہ جانتے ہوں۔

سن کر درج ذیل لکھو

الدین احمد

مسجد احمد 2979

DSP Legal  
 Mardan

سوال - آپ نے 15 مارچ 2013ء کو کسی پرچہ یا دستاویز کے بارے میں کچھ سنا لیا؟

جواب - جب عابد علی نے 14 مارچ کو اس وقت سنیے FIR کے بارے میں پتا چلا۔

سوال - عابد علی نے کوئی پرچہ اس دن دیا تھا؟ یا کسی کو گرفتار کیا تھا؟

جواب - سچے کچھ سنا نہیں ہے۔

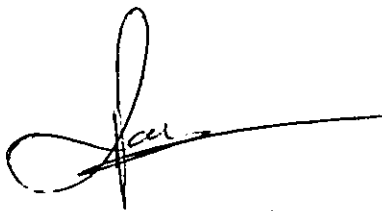
سن کر درج ذیل پرچہ  
2979  
12-10-23

Attested



PRINCIPAL  
ELITE POLICE TRAINING CENTRE  
NOVSHERA

12-10-23



DSP Lenal  
Mardan

62

بیان اذان و کھیل بڈٹ نمبر 644 کا مقصد کیا ہے اس میں

تعمیر و خود بیانی میں کہ ملکہ جانوران پر میرا اس پر صدمہ ہوا جسکو میں نے نہ جاننا تھا  
کے جوگی شہداء میں دیکھ کر خود نہ مجھے اس مال معجزہ کے بارے میں علم تھا۔ اور نہ ہی میں نے  
ذہن نہ دستخط کیے۔ مجھے اس بارے میں کوئی علم نہیں ہے میرا خیال ہے کہ دوست ہے۔  
کراس

XXX الیم علیہ عابدیہ اور اس کا وضع کیا جاتا ہے۔

سوال - روزنامہ جوگی کون حدیث لکھا ہے؟

جواب - نیاز علی

سوال - رہائش گاہ کے کاغذات کون بنا رہا تھا؟

جواب - نیاز علی

سوال - حرمہ 1.9.2023 کو نیاز علی کہاں تھا؟

جواب - مجھے یاد نہیں ہے

Abdul  
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ELITE POLICE TRAINING CENTRE  
HOWSHERA  
12/10/23

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Mardan

XXX - حرمہ 1.9.2023 کو ڈیپٹی پوسٹ کہاں تھی؟  
سوال - تحقیقات کون کیا رکھ رہا ہے؟

XXX - پورے واقعے - ISAA اور ضلعی عدالت کے بارے میں کیا جانتے ہیں؟

سوال - نیاز علی نے عابدیہ کو فون پر کیا کیا؟  
عابدیہ نے کہا کہنگ ہے۔ پرچہ دو - باقی تھے بیٹے نہیں ہے۔  
سوال - فراد پر آپ کے دستخط ہیں؟  
جواب - میں نے دستخط نہیں کیے۔

XXX - کامران عدالت کو جانتے ہیں؟

جواب - نہیں جانتا - نام سنا ہے۔  
سوال - آپ کو کتنے سے حلے؟

جواب - کوئی اندازہ -

اس ڈسٹ کے بارے میں  
الیم علی  
2644  
12/10/23

بیان از ان کیسٹل کے بارے میں 1663 متعین تھا نہ اس سے پہلے

بیانی خود کہ صرف 2/21 کو حسب معمول تھا نہ اس سے پہلے حالانکہ بعض پیش کرنے عدالت علاقہ مجسٹریٹ حوالہ ہو کر اس دوران کیسٹل نیوا علی LHC متعین ہوئی شہیدان نے حجے جو بائیل فون پر بتایا کہ تھا نہ ہذا میں صاحبزادان LHC کے موٹے میں 15AA کا مثل بنام کامران پڑا ہے۔ وہ اپنے ساتھ کچھری مردان لھے آئے۔ ملزم کچھری میں خود آئے گا۔ میں نے یہ بات محرم سٹاف کے نوٹس میں لایا۔ جب میں تحصیل مردان کچھری پہنچا۔ تو وہاں پر نیوا علی LHC ملزم امیراہ کچھری مردان آیا۔ کچھ دیر بعد نیوا علی LHC کا بھائی طارق LHC بھی کچھری مردان آیا۔ ملزم کو حجے حوالہ کر کے بتایا کہ اس کو پیش عدالت مجسٹریٹ کے صاحب موصوف عدالت نے بحق ملزم کیس میں پتلا دو نفی ضمانت کا آرڈر کر کے مگر ملزم نے ضمانت پیش نہ کیا۔ پھر عدالت نے ملزم کو ایک ہزار روپیہ جرمانہ جمع کرنے کا حکم دیا۔ مگر ملزم نے کہا کہ میرے ساتھ جرمانہ جمع کرنے کا رقم موجود نہیں ہے۔ صاحب موصوف عدالت نے ملزم کو کہا کہ اس سے ادھار لے لو مگر وہ بات کو ٹال مٹول کر دیا۔ پھر میں نے نیوا علی LHC کو کہا کہ اس کی جگہ جرمانہ جمع کرو مگر وہ بھی ضمانتی ہو گیا۔ اس کے بعد عدالت ہذا نے ملزم کامران کو حوالہ جوڈیشل میں رکھنے کا حکم صادر فرمایا۔ اور ساتھ ہی جیل وارنٹ دیگر میں ملزم امیراہ وارنٹ جیل داخل جیل مردان کیا۔ اور دربان جیل سے جمع کرنے کا رسید وصول کیا گیا۔ اس پر بیان ہے جو کہ دستخط ہے۔

Attested  
PRINCIPAL

Ayaz Ali

12.10.23

DSP Legal  
Mardan

XXX : عابد LHC کو اس کا حوالہ دیا جانا 5۔

سوال - ریٹائرڈ جوڈیشل نے بارے آپ کو اس نے کہا تھا؟  
 جواب - نیوا علی LHC نے یہی فون زے کہا کہ عابد LHC کے ٹھکانے میں مشین پر سے 50 سا گولہ لگا ہوا ہے۔  
 سوال - صاحب عدالت نے لہجے تو ملزم کامران جو خود لگا ہے۔  
 جواب - میں نے عدالت میں لہجے کر نیوا علی LHC کو فون پر لیا کہ عدالت میں ہوں تو نیوا علی LHC نے کہا کہ وہ آ رہا ہے۔ کچھ دیر بعد نیوا علی ملزم کامران کے ساتھ عدالت آ گیا۔

سن رد دستخط کیا۔ Ayaz Ali

کوئی نہیں ہے۔ آئیے دیکھیں۔  
نیاز علی سے۔  
میں نے طلبہ سے  
پیش کیا۔

سوال۔ جو کہا۔  
جواب۔ جلدی۔

کوئی ہزار حروف۔  
کوئی کہ یہ۔  
جرمانہ حج رُو۔  
سے وارڈوں۔  
اصل حائر چھوٹے۔

کیا غارہ۔  
سوال۔  
جواب۔

سوال۔  
جواب۔

سوال۔  
جواب۔  
سوال۔  
جواب۔

ATLISHED

12/10/23



سوال - کیا مندرجہ ذیل میں سے کوئی ایک ہے؟  
جواب - نہیں۔

سوال - کیا مندرجہ ذیل میں سے کوئی ایک ہے؟  
جواب - نہیں۔

سوال - کیا مندرجہ ذیل میں سے کوئی ایک ہے؟  
جواب - نہیں۔

سوال - کیا مندرجہ ذیل میں سے کوئی ایک ہے؟  
جواب - نہیں۔

سوال - کیا مندرجہ ذیل میں سے کوئی ایک ہے؟  
جواب - نہیں۔

سوال - کیا مندرجہ ذیل میں سے کوئی ایک ہے؟  
جواب - نہیں۔

سوال - کیا مندرجہ ذیل میں سے کوئی ایک ہے؟  
جواب - نہیں۔

سوال - کیا مندرجہ ذیل میں سے کوئی ایک ہے؟  
جواب - نہیں۔

سوال - کیا مندرجہ ذیل میں سے کوئی ایک ہے؟  
جواب - نہیں۔

DSP Legal  
Mardan

سوال - کیا مندرجہ ذیل میں سے کوئی ایک ہے؟  
جواب - نہیں۔

سوال - کیا مندرجہ ذیل میں سے کوئی ایک ہے؟  
جواب - نہیں۔

سوال - کیا مندرجہ ذیل میں سے کوئی ایک ہے؟  
جواب - نہیں۔

سوال - کیا مندرجہ ذیل میں سے کوئی ایک ہے؟  
جواب - نہیں۔

سوال - کیا مندرجہ ذیل میں سے کوئی ایک ہے؟  
جواب - نہیں۔

Attested  
PRINCIPAL  
ALFRED...  
17-10-23



سوال - طریق LHe دیوںی کھان کھی ؟

جواب - PAL مزاج حر دان -

سوال - طریق LHe کو اس انکواری میں کیوں لا یا گیا ؟

جواب - تھے پت نہیں -

سوال - عابد 14c حرم 21.9.21 کو کھان کھا ؟

جواب - جوئی سفیدال کھانہ رسم میں کھا -

سوال - اس دن عابد 14c کی کھانہ رسم سے کوئی گنت و سیرو لگائی تھی کیا ؟

جواب - گنت لگائی تھی لیکن عابد 14c 11.45، 12.00 دن ~~کھان~~ والیہ جوئی لگوائی -

سوال - ملزم کاغذوں کے صلے میں ISAA کس نے کریر کیا اور اس پر کس کے دستخط ہیں ؟

جواب - میں نے کریر نہیں کیا اور نہ اس پر سیرو دستخط ہیں -

سوال - ایماء کے قاعدات کس نے کریر کیے ؟

جواب - تھے پت نہیں -

سوال - اس بار علی 16b3 کو آج جانتے ہیں ؟

جواب - یوں والے کا بنا ہوا

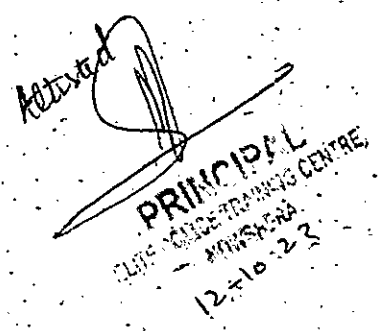
سوال - اس وقت بار علی 16b3 کی یوسٹنگ کھان کھائی ؟

جواب - کھانہ رسم میں کھی -

سوال - آج یوسٹنگ اس وقت کھان کھی ؟

جواب - میں 95 ڈیڑھ جوئی سفیدال کھا

سوال - اس وقت جوئی سفیدال پر حور کون کھا - روزنامہ کون حیدر کھا ؟



سید زینت بیگم  
سیار علی عابد

سوال - کارخانہ جلدیم ب خدمت 348 کو ترقی دینا۔  
جواب - ترقی نہیں ہے۔ عائد 144 دہا۔

سوال - جلدیم کارخانہ کا جملہ عمل کا جلدیم تک اور لگانے سے  
جواب - 21.9.53 کو کھانا طور میں ہوا تھا۔

سوال - کوئلے کے اس جلدیم کا کئی سیاحید ؟

جواب - سہارا انڈسٹری ہوا تھا مگر ہمیں سیاحید۔

سوال - آج کے اور آج کے کھانے کا طریقہ 144 نے جلدیم کارخانہ  
کی یاد دہانی سے کئی رسم و رسومات ؟  
جواب - نہیں لی۔

سوال - عائد 144 نے کئی رسم کارخانہ جلدیم سے لی ؟  
جواب - تھی یہ رسم۔

سوال - 21.9.53 کو آج کے کوئلے ڈپو کی کھانے ؟

جواب - جوئی کھانے کے فرزند پر صبح سے 8.30 سے کوئی 12.30  
حوالیہ تک نامہ بندی پر کھی۔

سوال - عائد 144 نے کارخانہ جلدیم کو کھانے بکرا ؟

جواب - ہاں کھین بکرا ہوا تھا۔ جوئی جلدیم کو لکھنؤ یا لکھا

سوال - کھانے رسم کے حور سناو کے اس 1588 کے نام سے آج کوئی

جواب - ہوا ؟ نہیں ہوا تھا۔

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Handwritten signature and scribbles at the bottom center.

موضوع صریح ہوں کہ میں بال برائے فریڈن میں عمر اسان سے تصفیحات تھا  
 ۱۹۵۵ء کو بے گھر خود سے موجود تھا کہ پولیس سے مجھے کال آئی کہ ابھی ابھی پولیس اسٹیشن آئے  
 اسٹیشن کو دیورٹ کرے۔ پولیس اسٹیشن آکر خود اسٹیشن سے مجھے میڈیم کو ایڈیٹر گارڈ کر کے بیان لیا کہ تمام  
 رقم میں طوع ۱۹۵۳ء کو کاسران وادفور چیمپ ساکن طور کے خلاف مجرم ISAA تھا  
 رقم مقدمہ جسٹس پیکر جس میں ملزم کاسران طوع ۱۹۵۳ء کو جیل منتقل کیا گیا ہے  
 جبکہ طوع ۱۹۵۳ء کو مذکورہ ملزم کے خلاف مجرم طوع ۱۹۵۳ء تھا طور کا مقدمہ ریٹائر  
 پیکر آپ کا خلاف الزام ہے کہ مذکورہ ملزم کے خلاف آپ کے صلح و مشورے سے ISAA  
 کا صرف ریٹائر ہو گیا۔ چونکہ میں بال برائے سوان میں ڈیوٹی لیا گیا تھا  
 تو طور اسٹیشن کے قانونی دفتر میں FIR ریٹائر کر کے گا کوئی احصیہ نہیں کیا گیا  
 شخص کو گرفتار کر دیا چھوڑ دو۔ امر یہ کہ ملزم مذکورہ کو سزا دیا جاتا ہے کہ کون ہے  
 اور جس کے ساتھ لکھا ہے جو ۱۹۵۳ء کو کوارٹر گارڈ کر کے لاہور سے علی آباد  
 انکو انگریزوں کے خلاف لکھا گیا ہے۔ حکم ہڈا سے ملتا ہے کہ کو برطرف کیا گیا جبکہ میں  
 نے سرورس ٹریبونل میں کیس وارڈ کر کے بے گناہ رہنے کی وجہ سے سرورس  
 ٹریبونل نے سب عالی کے احکام صادر کئے۔ بعد میں حکم کی طرف سے ڈیوٹی انکو انگریزوں  
 کرنے کیے۔ جہاں محمد اسحاق صاحب AIR انکو انگریزوں کے خلاف لکھا گیا ہے۔  
 اس کے کسنا خان کو برقیہ بیٹا اور خیاں کال میں جہاں کو برقیہ کے ساتھ  
 کو فرار کی جا حاصل ہوئی ہے۔ ~~بیان~~ بیان میں ملزم کے خلاف مقدمہ ۱۹۵۳ء  
 طوع ۱۹۵۳ء جیم 302/321 تمام طور کا مقدمہ طلب کر کے اس کے بیان سے بھی  
 حکم ملے گا۔ ان بیان کے دورے انکو انگریزوں کے خلاف لکھا گیا ہے۔  
 دیگر عدالتی فیصلے کو قانونی تقاضوں سے درست کر دیا۔

DSP Legal Mardan

محمد طارق

محمد طارق 1604/141

Attest  
 PRINCIPAL  
 12-10-23

کراس اعلیٰ ہونی چاہیے

XXX  
عبارہ ۱۱c کو کرائس کا حوت دیا جاتا ہے۔

سوال - آ - خدمت کاران کو لیلے سے جاننے کے لئے؟  
جواب - میں نہیں جانتا تھا۔

سوال - آپ کا خدمت کاران کیا کوئی حوالہ پر رالط تھا؟  
جواب - یہ سب کچھ میں طورو کفائ میں مدد خود تھا۔ اس وقت رالط رہا ہے۔

سوال - حورہ 2021-09-01 کو خدمت کاران کے ساتھ کیا اس سے کچھ دن لیلے یا لدرس حوالہ حوالہ پر آپ رالط تھا؟  
جواب - شاید سوچتا لیکن مجھے یاد نہیں۔

سوال - 2021-09-01 سے لیلے آپ کی خدمت ۱۱c عبارت سے لکھی خدمات سوا کھا؟  
یا حوالہ پر رالط سوا کھا؟  
جواب - میں آپ ۱۱c کو جانتا تھا۔ حوالہ پر رالط نہیں سوا کھا۔  
خدمات شاید ہوئی ہو۔

سوال - حورہ 2021-09-02 کو آپ خدمت کاران کے ہمراہ عدالت گئے تھے؟  
جواب - نہیں۔

سوال - کیا نسل ایاز علی ۱۱b3 کو جانتے ہیں؟  
جواب - جی جانتا ہوں۔ میرا دیگر حوالہ کا ٹرلا ہے۔  
سوال - نسل ایاز علی ۱۱b3 اور آپ جلتے رہتے تھے؟  
جواب - جلتے رہتے تھے۔

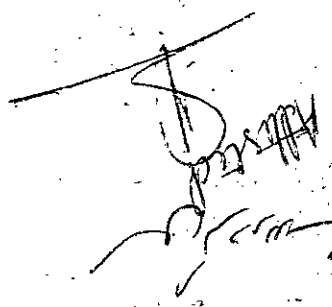
سوال - آپ کے عدوہ آپ کا کوئی کھالی حملہ پولیس میں ہے؟ یا رہا ہے؟  
جواب - جی۔ بیاز علی ۱۱c میرا کھالی ہے۔

سوال - 2021-09-01 کو بیاز علی کی پوسٹنگ کھالی تھی؟  
جواب - جی ہاں۔ چوکی سیدھا کھالی رسم میں اس کی پوسٹنگ تھی۔  
Legal  
Warden  
TRAINING CENTER

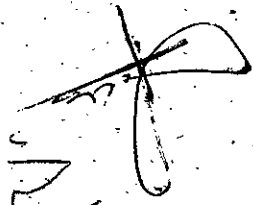
12.10.23

1608 THE WALL

12.10.23



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Handwritten text in Urdu script, arranged in several lines, likely a list or notes. The text is somewhat faded and difficult to read in detail.

میں اچھے اوقات  $\frac{265}{HLC}$  مقرر  $\frac{31}{21}$  سے جوئی سہارا میں کھینچتے ہیں  
 جوئی تھیں تھیں۔ لیکن جوئی سہارا میں جوئی مستقل قدر نہیں ہونے کی  
 وجہ سے جنرل ڈیوٹی لیسٹا کے ساتھ جوئی کے خط و کتابت کا خاکہ نہیں کرنا ہوتا  
 عابد خان HLC کا ڈیوٹی سہارا تھیں سے جوئی (4) ماہ قبل کی جاتی ہے۔ جوئی  
 تک مقرر  $\frac{09}{21}$  کی روزانہ کی جاتی ہے۔ جوئی میں جوئی کا جملہ اہلکار ایک  
 کر کے جوئی سہارا کے متعلق کوئی سہارا نہیں ملتا۔ جوئی اہلکار جوئی سہارا میں  
 کے سہارا کے حکم سہارا کے سہارا میں جوئی سہارا میں جوئی سہارا میں  
 نہیں ملتا۔ جوئی سہارا میں جوئی سہارا میں جوئی سہارا میں جوئی سہارا میں  
 جوئی سہارا میں جوئی سہارا میں جوئی سہارا میں جوئی سہارا میں جوئی سہارا میں  
 جوئی سہارا میں جوئی سہارا میں جوئی سہارا میں جوئی سہارا میں جوئی سہارا میں

*[Signature]*  
 HCPP - Ghazal  
 13-10-2023

XXX

سوال - آئی لینڈ جوئی سہارا پر کب ہوا ہے ؟  
 ج - 31.12.2021

*[Signature]*  
 DSP Legal  
 Ghazal

سوال - 01.9.21 کارڈ کیوں پیش نہیں کیا ؟  
 ج - یہ کارڈ جوئی میں نہیں ہے۔

سوال - ISAN برصغیر کامران اور 3022 برصغیر کامران اور اس سہارا کی  
 کیا تفصیل ہے ؟  
 ج -

تھے کہیں تک علم ہوا تھا کہ عابد HLC نے ایک پرچہ دیا تھا جس میں اس کو سہارا  
 کیا گیا۔ اس سے پہلے عابد HLC کے نام پر سہارا میں جوئی سہارا میں جوئی سہارا میں  
 میں جوئی سہارا میں جوئی سہارا میں جوئی سہارا میں جوئی سہارا میں جوئی سہارا میں  
 کامران طور کا رہا تھا ہے۔ میں اس کو لینا چاہتا تھا۔ اس سے جانتا تھا۔  
*[Signature]*  
 PRINCIPAL  
 GHAZAL  
 13.10.23

(69)

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(64)

✓ (90)

میں ظہور خان ASI سابقہ خیر و تعاون دستہ اس تحریر کی رو سے لکھو دینا  
یوں کہ عود خان ۱۰/۲۱ کو پورے ۰۸:۳۰ بجے میں بسلسلہ پیشی دفتر میں  
DSP صاحب سے سنی مردان گیا ہوا تھا اور دفتر سے اسی روز پورے ۱۷:۵۰  
والی ہو گیا۔ میرے دوائل اور والی حور خان ۱۰/۲۱ کے روز نامہ میں  
موجود ہیں۔ جہاں تک عابد خان ۱۴۷ کے صدر علی ۱۰۵۷ حور خان ۱۰/۲۱ جو  
ISAA تھا، اس کا سوال ہے۔ تو یہ میرے والی سے قبل تھا۔ یہی سب باتیں ہیں۔

27  
ASI-PP. Toxclair  
13-10-2023

Attested  
PRINCIPAL  
ELITE POLICE TRAINING CENTRE  
NOWSHERA

DSP Legal  
Mardan

PROVINCIAL  
ELITE POLICE TRAINING CENTRE  
KOLKATA

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DSP Legal  
Mardan

Signature  
PROVINCIAL  
ELITE POLICE TRAINING CENTRE  
KOLKATA

13.10.23

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Signature and handwritten notes.

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70

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صاحب عالی

97

گزشتہ بیان میں نے انکو اس میں نے  
جسے بیان دیا تھا۔ اب مجھے یاد نہیں ہے۔ لہذا  
میرا بیان انکو اس میں موجود نہیں ہے۔ جب کہ میں  
ایسا بیان دیکھ کر بعد بیان دوں گا۔

عابد IHC کو اس کا  
موقع فراہم کیا گیا۔ جس  
کوئی کو اس میں کیا  
ELITE POLICE TRAINING CENTRE  
HONSHAZA XXXX  
ظہور اللہ صالح خردگانہ رسم موضع 10/13  
آپ کی یونٹس کب تھی؟ اور کیا تھی؟  
2۔ میں جب یہ واقعہ ہوا تھا عابد IHC ایجازہ چوٹی تحصیل کا صاحب  
دراسہ بھیجا تھا تو اس وقت میں خردگانہ رسم مردان لغیبات تھا۔  
2/3 قہقہے لہے سے لغیبات تھا۔

سوال۔ آپ نے وہ دراصل عابد IHC کا بھیجا ہوا خود دیا تھا تھا۔؟  
میں نے نہیں دیا تھا تھا۔

سوال کیا عابد IHC فوراً 1.9.2021 کو کفایت رسم آیا تھا۔؟

2۔ جمعہ یاد نہیں ہے۔

سوال۔ عابد IHC کے کبھی کبھی کون کفایت آیا تھا اور FIR 1057/21  
میں کون کفایت کیا۔؟  
13-10-23

PRINCIPAL  
ELITE POLICE TRAINING CENTRE  
HONSHAZA

DSP Legal  
Mardan

ضیل خان آسی نے FIR

حالی کی تھی۔

2

کھانے آیا تھا۔

س۔ آپ نے بطور حذر بیاد علی بیاد اور سردار کی آگے بڑھنے سے  
میں کی گئی ؟

2۔ میں نے سید 24-25 صرف 21.9.01 اور وقت 16.10 کے چاکنگ پر حذر فرمائی تھی۔  
16.20

س۔ ضیل خان آسی کے دستخط آپ نے دیکھے ہیں ؟

2۔ مجھے یاد نہیں ہیں۔

س۔ اس ISBA کا حکم کون کیا تھا ؟ کیا برآمدگی ہوئی تھی ؟

2۔ کامران ولد نورجیب ملکہ نوان کی طور دوران۔ لیٹرل 30 بھر بددلتی کے عدد  
کارتوں پر آدھے ہیں۔ لیکن مجھے مراد سے لیا تو پیش نہیں آئے۔

س۔ مامقدم آپ کو حوالے ہوا تھا ؟

2۔ صرف 18.1.22 کو مجھے دیکھو۔ لیٹرل 30 بھر بددلتی کے عدد  
حکفے جاری، صحیح تاریخ عدد کارتوں بددلتی کے عاید 1170 نے  
میرے حوالے کیا۔

س۔ کیا یہ مامقدم سے آیا ہے ؟

2۔ نہیں۔

س۔ جب مراد سے کھانا کھیا تو اس دوران شہدائے حور سے آپ کو کوئی  
خون کیا گیا ؟ اور اس واقعہ کا کیا ہوا تھا ؟

2۔ مجھے نہیں بتایا گیا۔ مجھے کسی نے خون نہیں کیا۔

س۔ کیا ملزم کامران کو کھانے سے روکا گیا ؟

2۔ نہیں۔

DSP (Mardain)

سن رورہت لیم کیا  
13-10-23

مید خلیفہ الرحمن ASIA فورم 09/01 کو نظام رستم حسین خلیل ڈیوٹی پر  
 باہر نکلا۔ اس کے بعد 1057 فورم 09/01 کو ISAA نظام رستم حسین  
 کامران خان ولد نور حسین سائل فوٹو اکمل طور پر تمہاری ملکیت درج  
 رجسٹر کیا ہے۔ اور یہ FIR پر خلیل ڈیوٹی پر ہے اور تم  
 اس ASIA کو تیار علی LHC نے درج اسم جات عابد خان IHC  
 رستم ISAA تمام کامران خان خلیفہ الرحمن کو نظام رستم حسین کی ہے۔

Rm/mb  
 ASI-PS-choova  
 12-10-2023

XXX

سوال - FIR 1057 فورم 09/21 کو ISAA کے نام پر رجسٹر کیا گیا ہے یا نہیں؟  
 جواب - ایسی صورت پیش نہیں ہے۔

سوال - فورم 09/21 کو آڈٹ کیا گیا ہے؟  
 جواب - مجھے معلوم نہیں ہے۔ رستم کے نام میں تعینات کیا لیکن یاد نہیں کہ اس دن  
 آڈٹ کیا گیا تھا۔

سوال - اگر FIR پر یہ دستخط آئے ہیں تو کیا ہے؟  
 جواب - مجھے علم نہیں ہے۔

سوال - آڈٹ اس حوالہ ISAA کے بارے کیا جانتے ہیں؟  
 جواب - میں اتنا جانتا ہوں کہ یہ ہوگا کہ اس پر رجسٹر کیا جائے اور اس پر کیا  
 کیا ہوگا۔

سوال - اس پر رجسٹر کے بارے عابد IHC، تیار علی LHC، طارق IHC نے کیا ہے؟  
 جواب - میرے ساتھ کہنے کے بغیر بات نہیں کی ہے۔

سوال - عذر کامران کو جانتے ہیں؟  
 جواب - نہیں جانتا۔

سوال - ISAA FIR 1057 کی تیار آڈٹ ہے؟  
 جواب - نہیں جانتا۔

Attached  
 PRINCIPAL  
 ELITE POLICE TRAINING CENTRE  
 NOWSHERA  
 12.10.23

DSP Legal  
 Mardan

Rm/mb  
 12-10-2023



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

Tel No. 0937-9230109 & Fax No. 0937-9230111  
Email: [cpomdn@gmail.com](mailto:cpomdn@gmail.com)

(73)

2023

(69)

No. 9293 /PA

Dated 19/01/2023

**FINAL SHOW CAUSE NOTICE**

**IHC Abid Khan No.203 (Old No. 3293)**, while posted as In-charge PP Shaheedan (now Police Lines Mardan) have been dismissed from service on account of showing arrest of one Kamran resident of Nawan Killely with a 30 bore without number/unlicensed pistol in the area of PS Rustam vide case FIR No.1057 dated 01-09-2021 U/S 15AA PS Rustam in collaboration with LHC Niaz Ali No.3333 & LHC Muhammad Tariq No.1608 (both brothers and dismissed) who was actually present at Nawan Killely (Toru) at that time, as proved from his CDR analysis. He was produced before concerned court on the following day and was fined Rs.1000/-; however, in a deliberate and preplanned move, he intentionally refused to pay the fine, resultantly he was sent to Judicial lock-up. The main purpose of accused to be arrested and lodging in Jail was to have a plea of alibi and to get himself of absolved from being charged in a murder case vide FIR No.889 dated 03-09-2021 U/S 302/324/34 PPC PS Toru, which was committed by his brother namely Amir Sajjad after due planning and conspiracy, wherein he (accused Kamran) was also charged for the commission of crime.

In this connection, during the course of Departmental Enquiry, conducted by Mr. Adnan Azam, the then SDPO Sheikh Maltoon, held responsible you of grave misconduct & recommended for major punishment.

Later-on, you have been reinstated in service on the directions of K.P Service Tribunal and proceeded against departmentally (De-novo) through Mr. Abdul Hayee Principal EPTC Nowshera, who after fulfillment necessary departmental process, submitted his findings to this office vide his office letter No.3851-52/EPTC dated 19-10-2023, holding responsible you of grave misconduct and recommended that major punishment against you to be intact.

Therefore, it is proposed to impose Major/Minor penalty as envisaged under Rules 4 (b) of the Khyber Pakhtunkhwa Police Rules 1975.

Hence, I Najeeb-ur-Rehman Bugvi (PSP) District Police Officer Mardan, in exercise of the power vested in me under Rules 5 (3) (a) & (b) of the Khyber Pakhtunkhwa Police Rules 1975 call upon you to Show Cause Finally as to why the proposed punishment should not be awarded to you.

Your reply shall reach this office within 07 days of receipt of this Notice, failing which; it will be presumed that you have no explanation to offer.

You are liberty to appear for personal hearing before the undersigned.

Received by A

Dated: \_\_\_/\_\_\_/2023

(Najeeb-ur-Rehman Bugvi) PSP  
District Police Officer, Mardan.

Legal  
Mardan

To:

The worthy District Police Officer,  
Mardan.

(74)

(70)

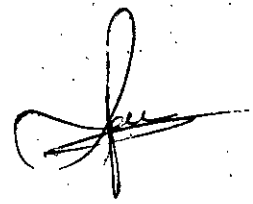
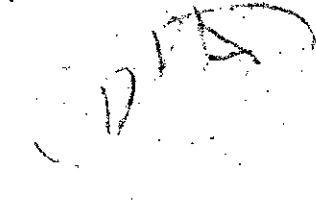
Respected sir,

**Reply/statement of Abid Khan IHC submitted as under:**

1. That I was appointed as constable in 2007 and successfully completed courses and then transferred to Elite Force where I performed my duties with zeal and fully devotion.
2. That, I have best service in highly appreciated and also granted commendation certificates and cash prizes on best performance. (Copy attached.)
3. That, my entire service is unblemished and there is no single complain against me during my entire service.
4. That, I was dismissed from service on 10.03.2022, on the grounds of misconduct, however, I am innocent and falsely/intentionally implicated in the case and dismissed from service.
5. That, dismissal order is unjust against the facts and liable to be set aside on the following grounds.

**Grounds:**

- That, because I neither scribed/dedicated/signed the Murasila nor I arrested the accused.
- That, because for taking judicial remand of the accused, the remand was also not signed by me and the scribed signed of mine is bogus and based malafide and having some ulterior motives by other officials who planned this story.
- That, because I also brought these facts of fake sign etc. in the notice of Superiors but they didn't verified my signatures and writings from any relevant expert and nor sent it to Forensic Science Laboratory (FSL), for matching signatures and writings.
- That, because the LHC Niaz Ali and his brother namely LHC Muhammad Tariq done all these illegal acts with due deliberations and consultations with accused Kamran without informing me and the superiors officials/inquiry officer perused the CDR of both Niaz Ali and Muhammad Tariq.
- That, because no impartial inquiry was conducted.

75

- That, because I was not provided opportunity of fair trial as envisaged in Article 10-A of the Constitution of Islamic Republic of Pakistan and principle of natural justice by not providing the opportunity to cross examine the accused and officials.
- That, because I having unblemished service record of about 15 years.
- That, because I was the sole bread earner of my family.

(71)

Prayer:

It is therefore humbly prayed to file the instant Denovo Inquiry as I was falsely and malafidely involved in the said act being innocent.

Abid Khan (IHC 3293)  
Contact No. 0346-5491598

Sir,

Submitted for perusal  
of orders

  
PA 02/11/23

~~DPE/M~~  
Dismissed  
from service

Najab  
16/11/23

OR  
Najab  
DPE/M  
02/11/23



OFFICE OF THE  
DISTRICT POLICE OFFICER,  
MARDAN

Tel No. 0937-9230109 & Fax No. 0937-9230111  
Email: [dpomdn@gmail.com](mailto:dpomdn@gmail.com)

Annexure 12

76  
2023

(77) 12

No. 10008-7 /PA

Dated 28/11/2023

ORDER ON DEPARTMENTAL (DE-NOVO) ENQUIRY OF IHC ABID KHAN NO.203

This order will dispose-off a Departmental (De-novo) Enquiry under Police Rules 1975, initiated against IHC Abid Khan No.203 (old No.3293), under the allegations that while posted as In-charge PP Shaheedan (now Police Lines Mardan) on 01-09-2021, he in collaboration with LHC Muhammad Tariq No.627 & LHC Niaz Ali No.2697 both brothers (now dismissed from service) had shown arrest of one Kamran resident of Nawan Killey Toru with a (30) bore without number/unlicensed pistol and (05) rounds in the area of PS Rustam vide case FIR No.1057 dated 01-09-2021 U/S 15AA PS Rustam, who was actually present at Nawan Killey\* (Toru) at the time of his alleged arrest, as proved from his CDR analysis. He was produced before the concerned court on the following day & was fined Rs.1000/-. However, in a deliberate and preplanned move, he intentionally refused to pay the fine, hence he was sent to Judicial Lock-up. The main purpose of accused to be arrested and lodging in Jail was to have a plea of alibi and to get himself absolved from being charged in a murder case vide FIR No.889 dated 03-09-2021 U/S 302/324/34 PPC PS Toru, which was committed by his brother namely Amir Sajjad, after due planning & conspiracy, in which, he (accused Kamran) was also charged for the commission of crime. Thus, IHC Abid Khan abetted & connived with Kamran to get him plea of alibi in murder case vide FIR No.889 PS Toru by registering a false case against him & showing him arrested in Police Station Rustam, whereas in actuality he was present in Toru at that time.

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After the allegations leveled against him were established during the course of departmental enquiry conducted by Mr. Adnan Azam, the then SDPO Sheikh Malto vide his office letter No.634/St-SMT dated 13-12-2021; in pursuance of this office Statement of Disciplinary Action/Charge Sheet No.226/PA dated 01-10-2021, the accused officer IHC Abid Khan was served with Final Show Cause Notice, issued vide this office No.1076-77/PA dated 07-02-2022 & founding his reply as unsatisfactory, the then DPO Mardan vide this office OB No.633 dated 09-03-2022, issued vide order No.2125-27/PA dated 10-03-2022 dismissed IHC Abid Khan from service.

Dist. Legal  
Mardan

Later-on, he was reinstated in service on the directions of K.P Service Tribunal vide this office OB No.1923 dated 22-09-2023, issued vide order/endorsement No. 4952-50/EF dated 22-09-2023 and a de-novo enquiry vide this office Statement of Disciplinary Action/Charge Sheet No.8982/PA dated 10-10-2023 was conducted through Mr. Abdul Hayee, Principal EPTC Nowshera, wherein the Enquiry Officer held the delinquent official responsible for the charges leveled against him and found him guilty of grave misconduct.

Being held responsible of grave misconduct by Enquiry Officer, IHC Abid Khan was served with a Final Show Cause Notice, under Khyber Pakhtunkhwa Police Rules-1975, issued vide this office No.9293/PA dated 19-10-2023, to which, his un-satisfactory reply was received.

Final Order

IHC Abid Khan was heard in OR on 16-11-2023, during which, he failed to present any cogent reasons in his defense, thus the undersigned being authority awarded him **major punishment of dismissal from service with effect from 09-03-2022**, in exercise of the power vested in me under Police Rules-1975.

OB No. 2314

Dated 21/11/2023

*Najeeb*  
(Najeeb-ur-Rehman Bugvi) PSP  
District Police Officer, Mardan.

Copy forwarded for information & n/action to:-

- 1) The Deputy Inspector General of Police Internal Accountability Branch Khyber Pakhtunkhwa Peshawar with reference to his good office letter No.1631-33/CPO/IAB dated 24-10-2023.
- 2) The Principal EPTC Nowshera with reference to his office letter No.3851-52/EPTC dated 19-10-2023.
- 3) The DSP/HQrs Mardan.
- 4) The E.C. & P.O (DPO Office) Mardan.
- 5) The In-charge Lab (HRMIS) DPO Office Mardan.
- 6) The OSI (DPO Office) Mardan with ( ) Sheets.

*Scu*  
DSP Legal  
Mardan



1) Annexide  
(L5)  
74

(78)

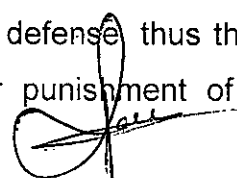
ORDER.

This order will dispose-off the departmental appeal preferred by **Ex-IHC Abid Khan No. 203/3293** of Mardan District Police, against the order of District Police Officer, Mardan, whereby he was awarded major punishment of dismissal from service vide OB: No. 2314 dated 21.11.2023. The appellant was proceeded against a de-novo departmental enquiry under Police Rules 1975, under the allegations that he while posted as Incharge Police Post Shaheedan on 01.09.2021, he in collaboration with LHC Muhammad Tariq No. 627 and LHC Niaz Ali No. 2697 both brothers (now dismissed from service) had shown arrest of one Kamran resident of Nawan Kille Toru with a (30) bore without number/unlicensed pistol and (05) rounds in the area of Police Station Rustam vide case FIR No.1057 dated 01-09-2021 U/S 15AA Police Station Rustam, who was actually present at Nawan Kille (Toru) at the time of his alleged arrest, as proved from his Call Data Record analysis. He was produced before the concerned court on the following day and was fined Rs.1000/-. However, in a deliberate and preplanned move, he intentionally refused to pay the fine, hence he was sent to Judicial Lock-up. The main purpose of accused to be arrested and lodging in Jail was to have a plea of alibi and to get himself absolved from being charged in a murder case vide FIR No.889 dated 03-09-2021 U/S 302/324/34 PPC Police Station Toru, which was committed by his brother namely Amir Sajjad, after due planning & conspiracy, in which, he (accused Kamran) was also charged for the commission of crime. Thus, IHC Abid Khan abetted and connived with Kamran to get him plea of alibi in murder case vide FIR No.889 Police Station Toru by registering a false case against him and showing him arrested in Police Station Rustam, whereas in actuality he was present in Toru at that time.

After the allegations leveled against him were established during the course of departmental enquiry conducted by Mr. Adnan Azam, the then Sub Divisional Police Officer, (SDPO) Sheikh Maltoon, Mardan the accused Officer IHC Abid Khan was served with Final Show Cause Notice and founding his reply as unsatisfactory, the then District Police Officer, Mardan vide his office OB No.633 dated 09-03-2022, issued vide order No2125-27/PA dated 10.03.2022 dismissed IHC Abid Khan from service.

Later-on, he was reinstated in service on the directions of Khyber Pakhtunkhwa Service Tribunal vide OB No.1923 dated 22.09.2023, issued vide order/endorsement No.4952-60/EC dated 22.09.2023 by the District Police Officer, Mardan and a de-novo enquiry was conducted by Mr. Abdul Hayee, Principal EPTC, Nowshera, wherein the Enquiry Officer again held responsible the delinquent Officer and recommended him for awarding major punishment. He was issued Final Show Cause Notice to which his reply was received and found unsatisfactory.

The delinquent Officer was heard in Orderly Room on 16.11.2023, during which, he failed to present any cogent reasons in his defense thus the District Police Officer, Mardan being authority awarded him major punishment of dismissal from service with effect from 09.03.2022.

  
D. P. Leoai  
Mardan

(75) 79

Feeling aggrieved from the order of District Police Officer, Mardan, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 24.01.2024.

From the perusal of the enquiry file and service record of the appellant, it has been found that allegations leveled against the appellant have been proved beyond any shadow of doubt. Moreover, the Investigating Officer of case FIR No. No.889 dated 03-09-2021 U/S 302/324/34 PPC Police Station Toru also affirmed the involvement of appellant in this heinous criminal case because Call Data Record of accused Kamran revealed that he was present in his village Toru despite his arrest in case FIR No. 1057 dated 01.09.2021 U/S 15-AA Police Station Rustam and on the very next day he came to District Courts, Mardan from his home where from he was sent to District Jail, Mardan. The accused Officer namely Abid Khan No. 203/3293 (appellant) staged the drama of the FIR for sending accused Kamran to Jail just to facilitate him in a murder which the brother of the accused planned to commit after two days. Hence, the involvement of appellant in such like activities is clearly a stigma on his conduct. Therefore, the retention of appellant in Police Department will stigmatize the prestige of entire Police Force as instead of fighting crime, he has himself indulged in criminal activities. Moreover, he could not present any cogent justification regarding his innocence.

Keeping in view the above, I, **Muhammad Suleman, PSP Regional Police Officer, Mardan**, being the appellate authority, find no substance in the appeal, therefore, the same is rejected and filed, being devoid of merit.

Order Announced.

83/LB  
30-1-24

(MUHAMMAD SULEMAN) PSP  
Regional Police Officer,  
Mardan.

No. 297 /ES, Dated Mardan the 29 / 01 /2024

Copy forwarded to District Police Officer, Mardan, for information and necessary action w/r to his office Memo: No. 200/LB dated 21.12.2023. His Service Record is returned herewith.

(\*\*\*\*)

DSP/ Legal, EC  
For reaction.

DPO/ Mardan.  
29.01-24.



DSP Legal  
Mardan

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

**Service Appeal No. 340/2024**

Abid Khan, Ex-IHC No. 203 Police Lines, Mardan

.....Appellant

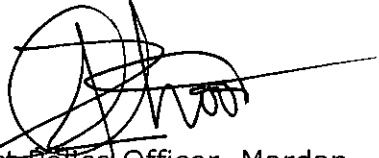
**VERSUS**

The District Police Officer, Mardan and others.

.....Respondents

**AUTHORITY LETTER.**

Mr. Atta-ur-Rehman Inspector Legal Branch, (Police) Mardan is hereby authorized to appear before the Honorable Service Tribunal, Khyber Pakhtunkhwa, Peshawar in the above captioned service appeal on behalf of the respondents. He is also authorized to submit all required documents and replies etc. as representative of the respondents through the Addl: Advocate General/Govt. Pleader, Khyber Pakhtunkhwa Service Tribunal, Peshawar.



District Police Officer, Mardan.  
(Respondent No. 2)  
**(ZAHOOR BABAR)<sup>PSP</sup>**  
Incumbent



Regional Police Officer, Mardan.  
(Respondent No. 1)  
**NAJEEB-UR-REHMAN BUGVI)<sup>PSP</sup>**  
Incumbent