


FORM OF ORDER SHEET

Court of _____

Appeal No. 772/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/06/2024	<p>The appeal of Mr. Humayoon Khan presented today by Mr. Fazal Shah Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 12.06. 2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No 772 /2024

Hamayun Khan.....Appellant

V E R S U S

CCPO & others.....Respondents


I N D E X

S.No	Description of Documents	Annexure	Pages
1.	Service Appeal with affidavit		1-4
2.	Copy of Notification dated 27-02-2023	A	5
3.	Copy of Complaint	B	6-7
4.	Copies of Statements/preliminary Inquiry Report & Affidavits	C & D	8-21
5.	Copy of Show Cause Notice & Reply	E & F	22-25
6.	Copy of Order dated 09-02-2024	G	26
7.	Copy of departmental appeal dated 04-03-2024 & Order dated 23-05-2024	H & I	27-34
7.	Vakalat Nama		35

Dated:-07-06-2024

Through

Appellant


Fazal Shah Mohmand
Advocate,
Supreme Court of Pakistan

OFFICE:- Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301 8804841
Email:- fazalshahmohmand@gmail.com

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No 772/2024

Humayoon Khan, Sub Inspector No MR/30, Capital City Police,
Peshawar.Appellant

V E R S U S

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Capital City Police Officer, Peshawar.

.....Respondents

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT 1974 AGAINST THE APPELLATE ORDER
DATED 23-05-2024 OF RESPONDENT NO 1 WHEREBY ON
PARTIAL ACCEPTANCE OF DEPARTMENTAL APPEAL THE
PENALTY OF DISMISSAL FROM SERVICE AWARDED TO
THE APPELLANT HAS BEEN MODIFIED INTO REVERSION
FROM THE RANK OF INSEPECTOR TO SUB INSPECTOR.

PRAYER:-

On acceptance of this appeal the impugned Order dated 23-05-2024, may kindly be modified thereby restoring the appellant to the rank of Inspector with effect from 09-02-2024, i,e the date of his dismissal with all back benefits.

Respectfully Submitted:-

1. That upon the recommendations of Khyber Pakhtunkhwa, Public Service Commission, the appellants was initially appointed as PASI in the year 2009, and with the passage of time and owing to his service record was promoted to the rank of Sub Inspector in the year 2014 and since appointment the appellant performed his duties with honesty and full devotion and to the entire satisfaction of his high ups.
2. That under Section 30 of the Police Act, 2017, the post of inspector is to be filled subject to competitive examination, 25% by selection from the Graduate Sub Inspectors, upon the recommendations of Khyber Pakhtunkhwa, Public Service Commission, the appellant being perfectly fit, eligible and coming up to the criteria, applied for appointment under the Section 32 of the Police Act, 2017 and after due process was appointed as Inspector vide Notification dated 27-02-2023 The appellant remained posted in various branches of the department and has unblemished service career. **(Copy of Notification dated 27-02-2023 is enclosed as Annexure A).**

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3. That the appellant while lastly posted as, Officer Incharge Investigation, Police Station Hayatabad, was entrusted investigation of Case registered vide FIR No 1754 dated 25-12-2023 U/S 9-D/11 CNSA of Police Station Hayatabad, wherein two persons were charged namely Amir Khan S/O Zarin Khan and his cousin namely Ahmad Ullah S/O Hussain Shah, during which one Zarin Shah, the father of one accused, submitted complaint dated 02-01-2024 to respondent No 1, for reinvestigation of the case and for disciplinary action against the appellant and one Constable, Attiqur Rehman, on the allegations that in order to favor the accused, the mentioned officers demanded illegal gratification from him. **(Copy of Complaint is enclosed as Annexure B).**
4. That upon complaint, preliminary inquiry was entrusted to Senior Superintendent of Police Investigation, Peshawar, who recorded statements of some of the concerned including the appellant but did not recorded the statements of important witnesses of the complainant while two witnesses of the complainant submitted affidavits denying the version of the complainant, but even then the inquiry Officer submitted his findings holding the appellant guilty of the taking illegal gratification from the complainant. **(Copies of Statements/preliminary Inquiry Report & Affidavits are enclosed as Annexure C & D).**
5. That there after Show Cause Notice was issued to the appellant on 16-01-2024 which the appellant replied in detail refuting the allegations and bringing true facts in detail. **(Copy of Show Cause Notice & Reply is enclosed as Annexure E & F).**
6. That strangely the appellant was awarded the punishment of dismissal from service by respondent No 1 vide Order dated 09-02-2024. **(Copy of Order dated 09-02-2024 is enclosed as Annexure G).**
7. That the appellant preferred departmental appeal before respondent No 2 on 04-03-2024, whereby the order of dismissal from service in respect of the appellant was modified into that of reversion in rank and the appellant was thus reverted into the rank of Sub Inspector vide Order dated 23-05-2024 with immediate effect. **(Copy of departmental appeal dated 04-03-2024 & Order dated 23-05-2024 is enclosed as Annexure H& I).**
8. That the impugned Order dated 23-05-2024 is against the law, facts and principles of justice on grounds inter-alia as follows:-

GRUNDS:-

- A.** That the impugned Order is illegal, unlawful, without lawful authority and void ab-initio.
- B.** That mandatory provisions of law and rules have been badly violated by the respondents and the appellant has not been treated according to law and rules in violation of Article 4, 10-A and 25 of the Constitution.
- C.** That the impugned order is in total disregard of the law on the subject, as the appellant was appointed as Inspector, upon the recommendations of Khyber Pakhtunkhwa Public Service Commission, and thus could not reverted into the rank from which he has not been promoted and as such void ab-initio.
- D.** That the impugned Order is also in violation of Rule 29 of the Fundamental Rules.
- E.** That the entire allegations are totally false, baseless and unfounded, which were never substantiated.
- F.** That no regular inquiry was conducted in the matter to have found out the true facts and circumstances.
- G.** That no Charge Sheet was issued to the appellant, thus no charge was framed against the appellant.
- H.** That the malafide is proved from the fact that the Inquiry Officer did not record statements of two impartial and material witnesses namely Khalid Khan and Sahibzada Farhan, thus the impugned Order is not tenable in the eyes of law.
- I.** That no evidence of any sort in support of the allegations was collected and brought on record rather two of the important witnesses namely Khalid Khan and Sahibzada Farhan have submitted their affidavits negating the allegations levelled by the complainant.
- J.** That the statements recorded also depicts that the same are not trust worthy and could not be made basis for action against the appellant.
- K.** That the appellant did nothing that amounts to misconduct, thus he has been punished for no omission or commission on his part.

- L. That there is nothing on record which even remotely suggest that the appellant ever favored the accused or ever threatened him or his family members.
- M. That the appellant was not afforded opportunity of personal hearing.
- N. That the appellant has about 15 years of service with unblemished service record.
- O. That the appellant seeks the permission of this honorable tribunal for further/additional grounds at the time of arguments.

It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for in the heading of the appeal.

Any other relief deemed appropriate and not specifically asked for, may also be granted in favor of the appellant.

Dated:-07-06-2024

Through

Appellant

[Signature]
**Fazal Shah Mohmand
 Advocate,
 Supreme Court of Pakistan**

**&
 Baseer Ahmad Shah
 &
 Ibad Ur Rehman Khalil
 Advocates, Peshawar**

LIST OF BOOKS:

- 1. Constitution 1973.
- 2. Other Books as per need

CERTIFICATE:

Certified that as per instructions of my client, no other Service Appeal on the same subject and between the same parties has been filed previously or concurrently before this honorable Tribunal.

[Signature]
ADVOCATE

AFFIDAVIT

I, Hamayun Khan, Sub Inspector No MR/30, Capital City Police, Peshawar, do hereby solemnly affirm and declare on oath that the contents of this **Service Appeal**, are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

[Signature]
DEPONENT

5 A



GOVERNMENT OF KHYBER PAKHTUNKHWA
OFFICE OF THE REGIONAL POLICE OFFICER,
MARDAN
Phone No. 0937-9230113, Fax No. 0937-9230114
Email: esp@mardan.gov.pk

No. 1154 /ES
ORDER

Dated Mardan, 27th February, 2023.

In pursuance of Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar letter no. 262-63/E-III dated 22.02.2023, the following candidates of this Region are hereby promoted/appointed as Inspector (BS-16) (28070-2260-95870) under Fast Track Promotion through Khyber Pakhtunkhwa, Public Service Commission, subject to verification of their documents/testimonials from the concerned Board/University.

S#	Name and father name	Domicile District
1.	Mr. Humayoon Khan S/O Said Uz Zaman	Swabi
2.	Mr. Nadeem Ahmad Turk S/O Fazal Rabi Turk	Swabi

Their posting order will be issued separately.

(MUHAMMAD ALI KHAN)PSP
Regional Police Officer,
Mardan.

S.S.P. Director PTS
Swabi 28/2/2023
cc.

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Inspector General of Police, HQrs Khyber Pakhtunkhwa.
3. Capital City Police Officer, Peshawar to relieve the Official mentioned at serial No. 01 presently posted under your command with the direction to report to this office.
4. Deputy Inspector General of Police, Training Khyber Pakhtunkhwa, Peshawar to relieve the official mentioned at serial No. 02 presently posted under your command in PTS, Swabi with the direction to report in this office.
5. AIG Establishment Khyber Pakhtunkhwa, Peshawar.
6. Director Police Training School, Swabi
7. District Police Officer, Swabi, their qualification/educational documents may please be got verified from concerned Board/University and intimate to Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar as well as to this office. Their ACRs dossiers be prepared and sent to office for countersignature and record.
8. ACR Clerk Region Office, Mardan.

ATTSTED

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B



① NU ASP Hayatabad
② S/O Zarin Shah
③ S/O Hussan Shah
④ Constable Attique Ur Rehman
Subject: For tomorrow

The worthy Chief Capital Police Officer,
District Peshawar.

10
03/11/24

OFFICE OF THE SNA
INVESTIGATION PESHAWAR
BY SP 02-C
DATE 03-11-24

Case FIR No. 1754 U/S. 9 D CNSA / 11 CNSA.

Dated 25.12.2023. PS. Hayatabad Peshawar.

Subject: APPLICATION FOR (I) RE-INVESTIGATION IN THE ABOVE CITED CASE. (II). INITIATING INQUIRY AGAINST HUMAYUN KHAN OJI, PS HAYATABAD. (III). CONSTABLE ATTIQU-UR-REHMAN ONDUTY WITH ASP HAYATABAD.

Respected Sir,

1. With profound reverence it is stated that the on the 24.12.2023 at approx: 10/11 PM my son namely Aamir Khan S/O Zarin Shah & my Nephew Ahmad Ullah S/O Hussan Shah were on the way to their native village at Landi Kotal from Peshawar.
2. That when the above named persons were reached near Sittara market, due to some reasons, some hot words had been exchanged with the police officials, as such they were apprehended and booked in the above noted case.
3. That thereafter the investigation officer demanded for money and the applicant arranged Rs:5,50,000/- (five Lacs Fifty Thousand PKR).
4. That in the meanwhile Attique Ur Rehman also contacted the applicant and asked for more Five Lacs Rupees, as such the applicant paid Rs: Four Lacs through Easy paisa to him vide A/C No. 55855001211463 Bank Alfalah A/C Title Attique-ur-Rehman.

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ATTSTED

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5. That thereafter they demanded for more sum of amount, and threatened to implicated other family members , if not paid .
6. That the above named accused/ persons are innocent, and they have been implicated in the case on the behest of some interested persons.
7. That the applicant , request that the matter may be intervened and a impartial inquiry may be conducted in the case matter, the matter may be re-investigated through any other impartial / Honest inquiry officer, and inquiry may be conducted against the above named police officials, in the best interests of justice.

Dated. 02.01.2024.

Applicant,

Zarin Shah
Zarin Shah

S/O Zafar Khan

CNIC.21203-3467004-7.

0308-2013102

*Copy to -
SSP investigation PBA QAW.*

ATTSTED

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C

جناب عالی

بلسلہ درخواست اذان زرین شاہ ولد ملزم عامر خان بکوالہ مقدمہ ملت 1754 مورخہ 25.12.2023 جرم-9D
CNSA/11A-CNSA/15-AA قہانہ حیات آباد معروفہ خدمت ہوں کہ مقدمہ بالا کی تفتیش میرے حوالے تھی۔ مقدمہ ہذا میں قبضہ
شہہ Revo گاڑی ملزم گرفتار شدہ کے بھائی کے نام پر ہے۔ اس سلسلہ میں ملزم کے بھائی حسب ضابطہ قہانہ طلب کیا گیا ہے۔ علاوہ ازیں ملزم
اور درخواست کنندہ سے کسی قسم کے پیسوں کی ڈیمانڈ نہیں کی ہے اور نہ ہی رقم وصول کی ہے۔ الزامات بے بنیاد ہیں۔ ملزم جیل میں ہے۔ درخواست کنندہ
کے میرے خلاف لگائے گئے الزامات اپنے تخت جگر بیٹے کو تفتیش میں ریلیف حاصل کرنے کے لیے راہ ہموار کرنے اور تفتیش کو متاثر کرنے کی کوشش
کی گئی ہے۔

Insp/Oll PS Hayat Abad
03.01.2024

Attested
10
04/01/2024

ATTSTED

ATTSTED

16/11/2000 / 250 / 250 / 250

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ATTSTED

21203-346704-7

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ATTESTED

24/01/2024

Attested

0315-5146403

4/1/2024

[Signature]

- [Handwritten text in Urdu script, likely a certificate or affidavit, mentioning dates and names.]
 [Handwritten text in Urdu script, mentioning '24/01/2024']
 [Handwritten text in Urdu script, mentioning 'Attested']
 [Handwritten text in Urdu script, mentioning '0315-5146403']
 [Handwritten text in Urdu script, mentioning '4/1/2024']
 [Handwritten text in Urdu script, mentioning a signature]



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OFFICE OF THE
ASSISTANT SUPERINTENDENT OF POLICE,
HAYATABAD SUB-DIVISION, PESHAWAR.



No. 03 /PA, dated Pesh: the 09/01/2024

To: The Capital City Police Officer,
Peshawar

Subject: INQUIRY AGAINST HUMAYUN KHAN OIL,
CONSTABLE ATIQ UR REHMAN.

Memo: The instant statement is submitted herewith on the direction of W/CCPO through
SSP/Inv: Peshawar.

Respected Sir,

I, the undersigned, Nayab Ramzan ASP Hayatabad Circle, hereby submit an official statement regarding a recent incident involving the arrest of two individuals for drug-related offenses in the Hayatabad area.

While on patrolling duty in the aforementioned area, I received credible information about the arrest of two accused involved in drug trafficking who were shifted to PS Hayatabad. Subsequently, I also visited PS Hayatabad, where I gathered comprehensive details about the accused. A significant amount of contraband was also seized from the accused party, as duly recorded in FIR No. 1754, U/S 9D CNSA/11 CNSA dated 25.12.2023.

I want to emphasize that I was not aware of any involvement of the OII (Humayun Khan) and the constable Atiq Ur Rehman mentioned above. Had I been cognizant of such involvement, I would have promptly initiated an impartial inquiry against them to uphold the principles of justice and fairness.

This statement is made to provide a clear and accurate account of the events surrounding the arrest and subsequent proceedings. I am fully committed to support any investigations and ensure transparency in the pursuit of justice.

Submitted, please.

Attested,

09/01/2024

(NAYAB RAMZAN) PSP
Assistant Superintendent of Police,
Hayatabad Sub-Division,
Peshawar.

ATTSTED

SR: SUPERINTENDENT OF POLICE, INV: CCP, PESHAWAR. (17)

Office Ph: No: 091-9210642
No. 245 /PA, Dated Peshawar the 10/01/2024.

The Capital City Police Officer,
Peshawar.

Subject:

COMPLAINT AGAINST HAMAYUN KHAN OII PS HAYATABAD AND FC
ATTIQ UR REHMAN IN CASE FIR NO. 1754 DATED 25.12.2023 U/S-9D/11 CNSA
PS HAYATABAD, PESHAWAR.

Reference attached.

ALLEGATIONS

The applicant Zarin Shah s/o Zafar Khan submitted an application to the undersigned in case FIR No. 1754 dated 25.12.2023 u/s-9D/11 CNSA PS Hayatabad, which reveals that:

- On 24.12.2023 at approximately 10/11 PM the son of applicant namely Amir Khan s/o Zarin Shah and his nephew Ahmad Ullah s/o Hussain Shah were on the way to their native village at Landi Kotal from Peshawar.
- When the said persons reached near Sitara market, due to some reasons, some hot words had been exchanged with the Police officials, resultantly they were apprehended and booked in the above noted case.
- Thereafter, the Investigation Officer demanded for money and the applicant arranged Rs: 5,50,000/-.
- In the meanwhile Attique Ur Rehman also contacted the applicant and asked for more 05 lacs rupees, as such the applicant paid Rs: 04 lacs through Easypaisa to him vide A/C No. 55855001211463 Bank Al-Falah A/C Title Attique Ur Rehman.
- Furthermore, they demanded for more amount, and threatened to implicate other family members, if not paid.
- Moreover, the above-mentioned persons are innocent, and they have been implicated in the case on the behest of some interested persons.
- More so, the applicant requested that the matter may be intervened and an impartial inquiry may be conducted in the case and be re-investigated through any other impartial/honest inquiry officer against the above named Police officials.

PROCEEDINGS

For the purpose to scrutinize the matter, the applicant and the alleged officials were called to the office of the undersigned, heard them in person and their statements were recorded and appended herewith, while the crux of their statements are as under:-

STATEMENT OF MISS NAYAB RAMZAN ASP HAYATABAD, PESHAWAR. (P/A)

She stated that while on patrolling duty in the Hayatabad area, she received credible information about the arrest of two accused involved in drug trafficking who were shifted to PS Hayatabad. Subsequently, she also visited PS Hayatabad, where she gathered comprehensive details about the accused while a significant amount of contraband was also seized from the accused party, as duly recorded in case FIR No. 1754 dated 25.12.2023 u/s-9D CNSA/11-CNSA. She further stated that she was not aware of any involvement of the OII/Inspector Hamayun Khan and FC Atiq Ur Rehman. She also stated if she was cognized of such involvement, she would have promptly initiated an impartial inquiry against them to uphold the principles of justice and fairness. More so, she further deliberated that her statement is made to provide a clear and accurate account of the events surrounding the arrest and subsequent proceedings and she is fully committed to support any investigations and ensure transparency in the pursuit of justice.

STATEMENT OF INSPECTOR HAMAYUN KHAN OII PS HAYATABAD (PRESENTLY UNDER SUSPENSION). (P/B)

He stated that the investigation of case FIR No. 1754 dated 25.12.2023 u/s-9D CNSA/11-CNSA PS Hayatabad was entrusted to him in which the under possession Revo vehicle is registered in the name of the brother of arrested accused. In this connection the brother of accused was called to PS concerned while he neither demanded the mentioned amount nor he received it. The allegations are baseless and the accused is presently in Judicial Lockup. He further stated that the applicant levelled allegations against him for the grant of relief to his son during investigation and to effect the same.

ATTESTED

OFFICE OF THE
SR: SUPERINTENDENT OF POLICE, INV: CCP, PESHAWAR.

Office Ph: No. 091-9210642
No. /PA, Dated Peshawar the / /2024.

STATEMENT OF SI BABAR KHAN OF PS HAYATABAD. (F/C)

He stated that on 24/25.12.2023 he was assigned the look after charge of SHO PS Hayatabad because of the station leave of Inspector Imran Alam Khan. Moreover, on the day of incident he received information and went to the place of occurrence along with Police officials, therein ASP Hayatabad was present at place of occurrence, while FIR No. 1754 dated 25.12.2023 u/s-9D CNSA/11-CNSA PS Hayatabad is correct according to the record. He further stated that the whole proceedings were done under the supervision of ASP Hayatabad and other officers. He further stated that he neither took any gratification from the applicant party nor demand for it.

STATEMENT OF HC ATTIOUE UR REHMAN PSO TO SDPO HAYATABAD. (F/D)

He stated that he is posted as PSO to ASP Hayatabad on 25.12.2023 at 11:50 am, he along with ASP Hayatabad and other officials went to the place of occurrence wherein the local Police arrested the accused namely Amir s/o Zarin Shah and Ahmad s/o Hussain Shah r/o Landi Kotal and recovered 1250 ecstasy tablets, 2400 grams ice and 5000 grams chars. Later on, I.O of the case received Police custody from Court concerned and the said accused were kept at Police Station Hayatabad. He further stated that on next day of registration of FIR the said accused had to pay 03 lac and 50 thousand rupees to Mr. Asim due to the urgent need. In this regard he provided his account number on humanitarians ground while the said amount was sent to Asim on next day, that could also be confirmed from Mr. Asim.

STATEMENT OF APPLICANT ZARIN SHAH S/O ZAFAR KHAN. (F/B)

He stated in respect of case FIR No. 1754 dated 25.12.2023 u/s-9D/11 CNSA PS Hayatabad, approximately at 10/11 hrs that his son Amir Khan and nephew Ahmad were on the way to Landi Kotal from Peshawar, meanwhile at Sitara Market due to verbal altercation with the local Police, they got arrested them and booked in the said case. He further stated that upon receipt of information regarding the said incident he informed his friend namely Khalid Khan (owner of Palace Hotel), meanwhile he contacted Inspector Hamayun Khan wherein he demanded five lacs rupees. Furthermore, Khalid Khan gave the demanded amount to Inspector Hamayun Khan for giving relief to his son in front of witnesses Junaid and Amir at Noor Bargain, Peshawar while, on 25.12.2023 the Inspector Hamayun Khan demanded for further fifty thousand rupees, which was handed over to him in presence of witness namely Farhan Alam (total five lacs and fifty thousands rupees were handed over to Inspector Hamayun Khan OII PS Hayatabad). He further stated that Attique Ur Rehman presently performing his duty with ASP Hayatabad contacted me and demanded for five lac rupees for dismissal of the case, meanwhile he sent money worth amounting 04 lacs to Attiq Ur Rehman from easypaisa account to Bank Alfalah account No. 55855001211463 (receipt enclosed). Applicant requested for impartial investigation, recovery of said money and initiating proper departmental proceedings against the accused officials.

STATEMENT OF TAHIR KHAN S/O ZARIN KHAN (BROTHER OF ACCUSED AMIR). (F/B)

He stated that on 25.12.2023 his brother accused Amir called him stating therein that he is sending account of Bank Alfalah and he deposited 04 lacs rupees in the said account. First transaction of amount Rs: 2,50,000/- was made to account titled Attique Ur Rehman having account No. 55855001211463. Thereafter, second transaction of amount Rs: 47,000/-, third transaction of amount of Rs: 1,00,000/- were made on the mentioned account. Thus, total amount of Rs: 3,97,000/- plus 3000/- transaction fee was deposited on the said account. He further stated that after last transaction he sent screenshot of the same to Attique Ur Rehman on WhatsApp wherein he replied "Ok".

STATEMENT OF MUHAMMAD JUNAID S/O SUFAID ULLAH KHAN R/O ZARGARAN LANDI KOTAL (RELATIVE OF ACCUSED AMIR). (F/G)

He stated that on 29.12.2023, Haji Zarin Shah told him to go with his friend namely Khalid and hand over 05 lacs rupees and also told him to count the said amount. Later on, the sum amount was handed over to Khalid in front of Haji Zarin Shah house situated at Phase No. 02 Hayatabad. More so, he and his elder brother namely Amir Khan on motorcycle followed the motor car of Haji Zarin Shah toward Pishkhabra, while when they reached Pishkhabra Chowk Khalid told him that Inspector Hamayun Khan allocated Noor Bargain for receiving the said amount but he did not know the location of Noor Bargain. Consequent upon, he indicated him Noor Bargain situated at Ring Road and therein 02 persons were standing, in which one is duly armed with Kalashnikov and seem like gunner. Thereafter, Khalid handed over the said amount to them. Subsequently, Khalid called Haji Zarin Shah and told him that the amount Rs: 05 lacs has been handed over to Inspector Hamayun Khan.

ATTSTED

OFFICE OF THE
SR: SUPERINTENDENT OF POLICE, INV: CCP, PESHAWAR.

Office Ph:No. 091-9210642

No. /PA, Dated Peshawar the / /2024.

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STATEMENT OF AMIR KHAN S/O SUEAID ULLAH KHAN R/O ZARGARAN LANDI KOTAL
(RELATIVE OF ACCUSED AMIR). (F/H)

He stated that on 29.12.2023, Haji Zarin Shah told him to go with his friend namely Khalid and hand over 05 lacs rupees and also told him to count the said amount. Later on, the sum amount was handed over to Khalid in front of Haji Zarin Shah house situated at Phase No. 02 Hayatabad. More so, he and his brother, namely Muhammad Junaid on motorcycle followed the motor car of Haji Zarin Shah toward Pish'takhara, while when they reached Pish'takhara Chowk Khalid told him that Inspector Hamayun Khan allocated Noor Bargain for receiving the said amount but he did not know the location of Noor Bargain. Consequent upon, he indicated him Noor Bargain situated at Ring Road and therein 02 persons were standing, in which one is duly armed with Kalashnikov and seem like gunner. Thereafter, Khalid handed over the said amount to them. Subsequently, Khalid called Haji Zarin Shah and told him that the amount Rs: 05 lacs have been handed over to Inspector Hamayun Khan.

CONCLUSION:

Keeping in view the above circumstances i.e. statements of witnesses and evidentiary proof available on record it came to surface that the alleged officials Inspector Hamayun Khan OII PS Hayatabad presently under suspension and FC Attique Ur Rehman PSO to ASP, Hayatabad are found guilty for taking illegal gratification from the applicant.

Submitted for kind perusal, please.

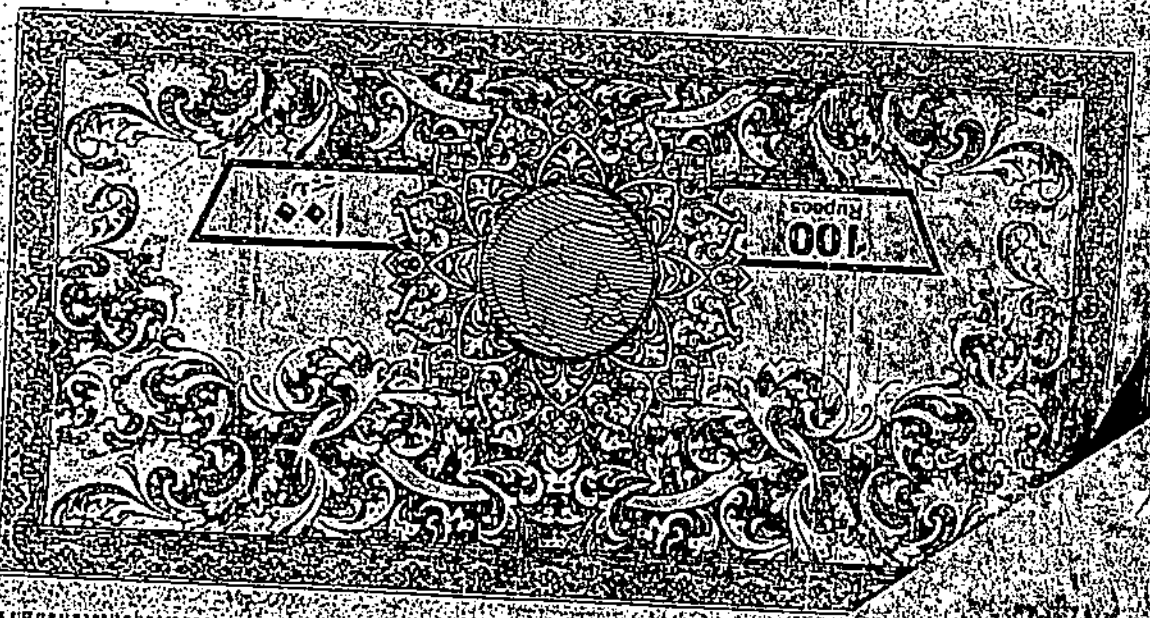
Muhammad Ashfaq
(Muhammad Ashfaq) PSP
Senior Superintendent of Police,
Investigation, CCP, Peshawar

ATTSTED

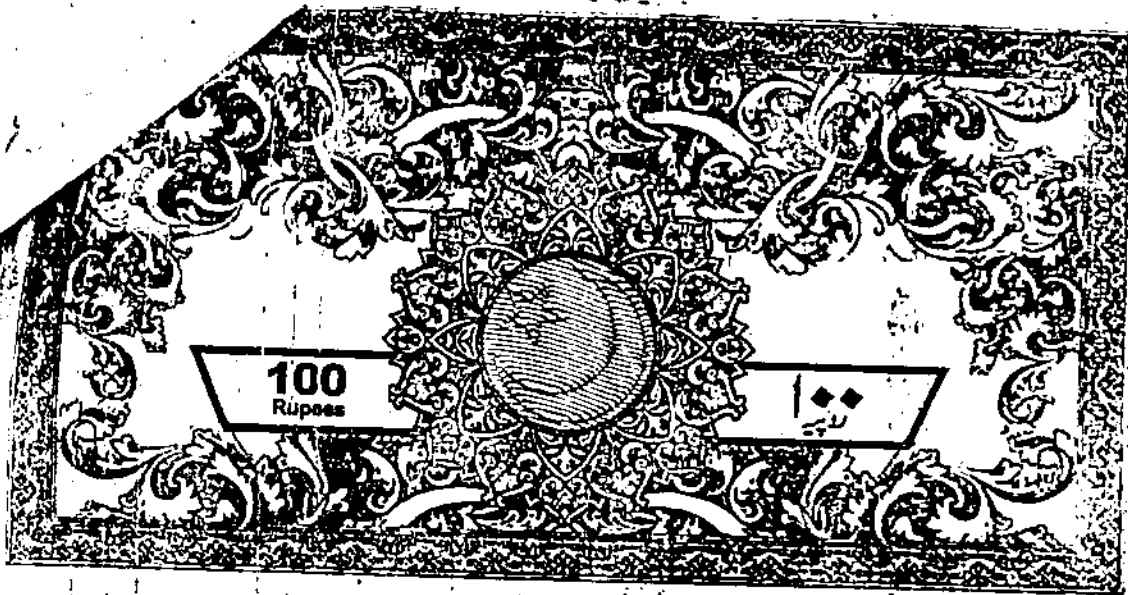
ATTESTED
19/02/24

0360-5900317
17301-5337507-9
ATTESTED

الحمد لله
19-02-2024
میں نے اس پر دستخط کیا ہے اور اس پر دستخط کرنے کے بعد اسے
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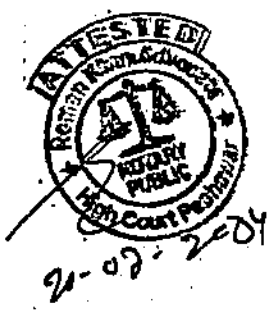


بیان الحقیقت

میں سہی صاحبزادہ فرحان علی صاحب اور صاحبزادہ سعید علی صاحب نے اپنے آپ کے درمیان
 ایک زمین کی خرید و فروخت کی ہے اور اس کا بیٹا نادر حسین نے اس میں حصہ لیا ہے
 اور یہ زمین ان کے درمیان جو الام لکھا گیا ہے اس میں ان کے حصے کو فروخت کرنے میں
 مبلغ 50000 روپے کا رقم دیا گیا ہے اس میں کوئی عداوت نہیں ہے
 اور ان کو فروخت کرنے میں زمین کے ہاں کوئی رقم نہیں رکھی ہے اور جو
 اور زمین کو فروخت بیان ہے بیان الحقیقت لکھا گیا ہے

صاحبزادہ فرحان علی صاحب
 (Signature)

صاحبزادہ فرحان علی صاحب اور صاحبزادہ سعید علی صاحب
 رجسٹرڈ نمبر 17102-7533276-3
 8868866



ATTSTED
 (Signature)



OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR

Phone No. 091-9210989 Fax: No. 091-9212597

22

E

No. 171 /P/CCP dated 16/01/2024

SHOW CAUSE NOTICE
(Under Rules 5(3) of KPK Police Rules 1975)

That you Inspector Hamayun Khan MR/30, while posted as OI Police Station Huyatabad, Peshawar have rendered yourself liable to be proceeded under Rules 5 (3) of the Khyber Pakhtunkhwa Police Rules 1975 for the following misconduct:-

- I. That you, at preliminary enquiry conducted by SSP/Investigation, Peshawar vide No. 245/PA, dated 10.01.2024, in which you were found guilty on account of complaint registered by the complainant namely Zarin Shah &/o Zafar Khan alleging therein that you demanded money of Rs. 550000/- from the complainant and received the said amount.
 - II. Your act of demanding illegal gratification/bribe from the general public is intolerable and brought bad name for the department.
 - III. Being a member of police force, your act is highly objectionable and comes within the ambit of corruption according to Police Rules.
- 2). That the misconduct on your part is prejudicial to good order of discipline in the Police force.
 - 3). I therefore, called upon you to show cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules 1975 for the misconduct referred above.
 - 4). You should submit reply to this show cause notice within 07 days of the receipt of the notice, failing which an ex-parte action shall be taken against you.
 - 5). You are further directed to inform the undersigned that you wish to be heard in person or otherwise.
- (ii) Your this attitude is highly unprofessional and resulted into a huge loss to innocent citizens.
Being a member of police force, your response and attitude was against the Police Rules and brought bad name for the department.

CAPITAL CITY POLICE OFFICER,
PESHAWAR.

Copy of the above is forwarded for information to the

- SSP/Operations, Peshawar.

ATTSTED

Before the Hon'ble Capital City Police Officer Peshawar

23

Subject: Reply to Show Cause Notice vide Endst. No. 171/PA/CCP, dated 16.01.2024.

Respected Sir

Kindly refer to the subject show cause notice at the very outset I respectfully submit that the alleged charge of corruption and involvement in corrupt practices / receiving illegal gratification of Rs 550000/- is very much false, fabricated and based on malafide rather than statement. Since, I have joined this force, I did not even think to cause damage to the integrity / image of police force. The undersigned offer the following submissions, inter-alia on the following grounds, amongst others.

PRELIMINARIES:

1. Perusal of formal inquiry clearly reflects that I have been not associated with the inquiry proceedings as no cross opportunity provided to me on the so called evidence recorded by worthy inquiry officer, hence the recommendation is void abenitio/without jurisdiction and without reliance under the eyes of law.

2. The alleged enquiry has been conducted without giving an opportunity of being heard, therefore, legally, it can't be used against the undersigned.

3. The charges against me are trumped up for ulterior motives at the behest of person having contrast of interest with me, therefore, the same are based on malafide concoction and fabrication to harm the reputation, career and unblemished service record of myself for which I reserve the right of defamation and damages in proper courts of jurisdiction.

4. There is not an iota of direct or indirect evidence to support the bald charge of the complainant. On the other hand there is circumstantial evidence of booking and investigating son of the complainant for heinous crime, for which staged drama of false complaint against the undersigned.

5. The complaint is conscious attempt on the part of drug peddlers to dent the morals of those officers who performed their duties beyond the call of duty.

ATTSTED

With regard to corrupt practices, I would like to submit that it has been leveled without any cogent and supporting materials. Needless to say that corruption charge requires solid materials but here on record, nothing is available. Rules regarding proceedings against Police Officers reported to be corrupt, attract rules 16.39 r/w 16.16 PR 1934 wherein corruption record is required to be maintained on personal file, character role or fault record and attested copy thereof shall be furnished to the police officer concerned, but such record is not available/exist against me hence the charge does not carry legal footings.

Worth mentioning that it has become very common that when some differences between locals and local police are stirred up or relations between colleagues and the subordinates become strained, complaints emerged in the shape of complaint with serious allegations against the police officer without any solid materials. Registration of criminal narcotics case on recovery of huge drugs i.e. impatamine tablets 1250, ice 2400 grams and Charas 5000 grams along with unlicensed pistol 9MM with 10 Cartridges vide FIR No 1754/2023 u/s 9(D)CNSA/11(CNSA, 15AA against the complainant's son namely Amir can't be excluded as one of the cause of false implication, casting shadow on the integrity of complainant party.

ON FACTS

- I. The recorded evidence before the worthy inquiry officer are shattered and unbelievable as none of the witnesses i.e. Ms Nayab Ramzan ASP, SI Baber Khan, HC Attique ul Rehman, Zarian Shah, Tahir Khan, Muhammad Junaid and Ameer Khan confirmed receiving of illegal gratification by me, therefore are not consistent on the alleged issue.
- II. The narcotics case investigation against the complainant's son has been conducted honestly, dedicatedly and no favor extended to the accused party, therefore in case of such huge transaction how it was possible, having left no lacuna to favor accused party during judicial test/trial.
- III. Since, I have joined this August force, I always performed honestly, dedicatedly and to the entire satisfaction of my superiors. My clean service carrier can be verified from my ACRs and from the officers under home subordination. I remain posted. There is nothing any adverse remarks / corruption charges on my ACRs

ATTSTED

(Specified column) therefore I am innocent and is being implicating on malafide basis.

IV I have been suspended but Rule 16.18 Police Rules 1934 r/w 43 of FR. Clearly provides that un-necessary suspension should be avoided because it not only suffers the assigned work but also amounts to additional penalty. the circumstances therefore warrants and justifies my release from suspension. as per above stated provision.

V During my services in this august force, I have always performed beyond the call of duty at the risk of my life and never hesitated to bring the writ of Govt / Police department.

VI Requesting for personal hearing to explain actual circumstances behind the alleged charge.

In circumstances, the alleged charge bears no authenticity, being without merit with substance. I request that the show cause notice may very kindly be filed without further proceedings.

Sincerely Yours

Inspector Humayoon Khan No. MR/30
Police Lines, Peshawar.

ATTSTED



(26) G

**OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR**
Phone No. 091-9210989 Fax: No. 091-9212597

ORDER

Inspector Hamayun Khan No. MR/30, while posted as OII Police Station, Hayatabad, Peshawar was issued Show Cause Notice vide this office No. 171/PA/CCP, dated 16.01.2023 on the charges that he, as per enquiry conducted by SSP/Investigation, Peshawar vide No. 245/PA, dated 10.01.2024 was found guilty on account of complaint registered by the complainant namely Zarin Shah s/o Zafar Khan alleging therein that he demanded money of Rs. 550000/- from the complainant and received the said amount for favoring his arrested son from whom synthetic drugs were recovered in huge quantity. His act of demanding illegal gratification/bribe from drug smugglers is intolerable and brought a bad name for the department. Moreover, being a member of Police Force, his act is highly objectionable and comes within the ambit of corruption according to Police Rules.

2- The alleged official submitted his written reply to the Show Cause Notice which was perused and found unsatisfactory.

3- He was heard in person in Orderly Room and record of the case and enquiry conducted by SSP/Investigation has been perused. During personal hearing the delinquent officer failed to submit any tangible reason in his defense. The case file-perusal also reveals that no significant efforts have been made by him to unearth the whole gang, arrest its members and make further recovery of drugs. I am therefore, convinced that he has got money as concluded by the Enquiry Officer from a drug smuggler and as such earned a bad name for the department. Keeping in view the gravity of his delinquency and findings of the enquiry I, being competent authority dispensed with the regular departmental proceedings and hereby award him the major punishment of "Dismissal from service" with immediate effect.

"Order is announced"

**CAPITAL CITY POLICE OFFICER,
PESHAWAR**

No. 461-74 /PA-CCP, dated Peshawar the 09 02/2024

Copies for information and necessary action to the :-

1. SSSP/Operations, Coordination & Investigation Peshawar.
2. SsP/Cantt., HQr. & Security Peshawar.
3. AD/IT CCP Peshawar.
4. OS, AS, EC-II, PSO & PO.
5. FMC alongwith complete original file.
6. Official concerned.

ATTSTED

(27) H 13361/SB

Before the Hon'ble Inspector General of Police, Peshawar

Subject: APPEAL U/R 11(2) KP POLICE RULES 1975 (AMENDED 2014) AGAINST THE ORDER PASSED BY WORTHY CAPITAL CITY POLICE OFFICER, PESHAWAR VIDE ENDST NO. 461-74/PA DATED 09.02.2024.

Respected Sir

The appellant respectfully prefers this appeal against the impugned order of Worthy Capital City Police Officer (CCPO), Peshawar, inter-alia on the following grounds, amongst others: (Order is enclosed as Annexure-A).

PRELIMINARIES:

1. That the order impugned in this appeal is coram non-judice as under Rule 11(2) of the Police Rules, 1975 the Worthy CCPO, Peshawar is Appellate Authority and not the original forum to proceed against the officer of the Rank of Inspector. Therefore, the order of the Worthy CCPO, Peshawar, impugned herein this appeal is not maintainable.
2. That the punishment awarded by the Worthy CCPO, Peshawar vide order Annexure "A" is against the spirit of Rule 16.2 of Police Rules 1934, therefore, the same is not maintainable.
3. That the proceedings conducted before the Worthy CCPO, Peshawar are vitiated drastically by not following the dictate ordained in Rule 6 of the KP Police Rules, 1975 (as Amended in 2014) as no fair opportunity of cross-examining the witnesses has been provided to the Appellant.
4. That the punishment awarded to the Appellant did not commensurate with the allegations as levelled against the Appellant in the Charge-Sheet, which is against the spirit of the decisions of the superior Constitutional courts.
5. That the Appellant has an unblemished record of service and has always endeavored to keep the honour of the Force up at any cost. While awarding such a heinous punishment, this aspect of the service of the Appellant has been totally omitted.

ATTSTED

Office of the Inspector General of Police (Peshawar)
Dist. No. 344
Dated 04/23/2024

That the appellant refers rule 16:2 Police Rules 1934 wherein it has been clearly provided that the punishment of dismissal is to be awarded very cautiously and with circumspection; relevant para whereof is enunciated as under:-

"Dismissal shall be awarded only for the gravest acts of misconduct or as the cumulative effect of continued misconduct proving incorrigibility and complete unfitness for police service. In making such an award regard shall be had to the length of service of the offender". The competent authority awarded major penalty of dismissal to appellant for no act or attribution having not been committed rather no continued misconduct on the part of appellant exists. Moreover, the appellant served this august force for such a long period of about 10/12 years but the authority didn't consider the mandate provision laid down in r. 16:2 PR 1934

The impugned order of Worthy CCPO Peshawar is without lawful authority and without jurisdiction as he was within meaning of rule 11(2) Police Rule 1975 is the appellate forum and not the authority. For the departmental proceedings against the rank of Inspector as per schedule-1 Police Rule 1975 DPO/SSP is the authority hence he (Worthy CCPO Peshawar) could not take upon himself the role of authority impugned order was set aside and appellant reinstated with back benefits by the learned superior court. Reliance is placed on the reported judgment 1988 PLC (CS) page 387.

8. That the worthy inquiry officer did not follow prescribed procedure as per rule 6 of KP Police Rules 1975 (Amended 2014) relevant para whereof is reproduced as under:- "The inquiry officer shall inquire into the charge and may examine such oral or documentary evidence in support of the charge or in defense of accused as may be considered necessary and the witnesses against him". The worthy inquiry officer though has examined witnesses but he did not follow the prescribed procedure as per rule 6 of KP Police Rules 1975 (Amended 2014) providing no cross opportunity to appellant, even not associated him with proceedings, therefore disciplinary process contains gross legal infirmities. The finding report is also void ab initio and coram non-judice within the provision of Rule 6(v) of rules 1975 hence not tenable (Reported judgment 2005 PLC (CS) Page 1544)

9. As per rule 6(v) of rule 1975 the worthy inquiry officer had only to submit cogent grounds to connect the appellant with alleged charge but no ground has so far

ATTSTED

been collected and brought on record therefore recommendation of inquiry officer is without jurisdiction and that too not provided under the Police Rules 1975

0 The worthy inquiry officer did not bother to examine 02 material witnesses i.e. Khalid Khan and Farhan Alam during proceedings, allegedly made payment of amount of RS 550000/- but acted at his own whim and fancy, submitted finding report on assumption which as per law is not tenable. These 02 star witnesses clearly deny the alleged payment and in this regard, they have submitted affidavits exhibit A/1 and A/2 crystal clearly rebutting the alleged charge.

1.1 The punishment is very harsh and as per superior court judgment the quantum of judgment must be appropriate, compatible and reasonable (1988) PLC(CS) Page 179)

ON FACTS:

ii Short facts are that the appellant was handed over investigation of a case u/s 9D CNSA/11 CNSA/15AA vide FIR 1754 dated 25.12.2023 PS Hayatabad Investigation in which was started in accordance with the provisions of law and the Rules.

iii During course of investigation one Zareen Shah, f/o accused Amir submitted an application to the authority alleging therein that the appellant had taken RS 550000/- as illegal gratification for allegedly discharging son of the Complainant from narcotics case under investigation but the commitment was not honored despite receipt of the money. It was accordingly prayed in the complaint that the alleged money paid to the Complainant may be recovered (from the Appellant) and proper enquiry against the Appellant be launched.

iv That the Complaint of the father of a drug peddler was entertained and preliminary enquiry initiated. During the Course of enquiry, the Inquiry Officer obtained the statement/reply of the Appellant as Annexure "B" recorded evidence adduced by the Complainant party and thereafter submitted his report to the Authority but did not fix responsibility, nor dig out the actual facts, which is enclosed as Annexure "C" for perusal please.

v That without looking into the factual and legal lacuna in the enquiry report (Annexure "C") the worthy Authority accepted the recommendations of the Inquiry Officer and inflicted the highest punishment of dismissal from service of

ATTSTED

the Appellant vide the impugned order dated 09.2.2024, copy of which is enclosed as Annexure "A"

v. That the impugned order is illegal, arbitrary and defective from all the fours, therefore, it has caused heavy damage to the Appellant. Therefore, the same is assailed on the following legal grounds, amongst others to be submitted at the time of hearing, when afforded.

vi. Worth to highlight that in a likewise case, in reported judgment 1989 PLC(CS) Page 336, a civil servant was dismissed from service on the charge of corruption, but no solid proof or material was found against appellant except his cheque book and deposit of substantial amount in his bank. Appellant's dismissal was set aside and he was reinstated that no cogent evidence to connect the appellant with his bank account could be collected rather brought on record, no case of misconduct was made against him.

vii. The appellant faced preliminary enquiry and submitted detailed reply (Exhibit B) but could not be considered and thereafter the inquiry officer submitted finding report without adopting the procedure of enquiry (Ex C).

viii. On submission of finding report of preliminary enquiry by worthy inquiry officer, the authority without going into the merits of the case, passed the impugned order dated 09.02.2024, and dismissed the appellant from service without justifiable cause or cogent grounds.

ix. The appellant has not given an opportunity of cross-examination in the orderly room nor so called two witnesses were called to associate in the proceedings by the competent authority.

x. The appellant repeatedly requested the competent authority in the orderly room for cross-examination of the so called two witnesses but in vain as the competent authority had made his mind for awarding major punishment of dismissal from service, due to some ulterior motives.

LEGAL GROUNDS:

a. That the impugned order is coram non iudice, as the competent authority to proceed against the Appellant, being an Inspector, was the Worthy District Police Officer (SSP) and not the Deputy Inspector General of Police (DIG/CCPO). In this regard reliance is placed on Rule 11(2) read with Rule 6(V) of the Police Rules, 1975.


ATTSTED

b. That without prejudice to the ground above by taking cognizance by the Worthy DIG/CCPO, the Appellant has been deprived of one step of appeal/remedy and thus fundamental miscarriage of justice has been committed.

c. That the enquiry proceedings were carried out in clandestine manner without affording an opportunity to the Appellant to be present and critically evaluate the mischief emanating from these statements and to put the witnesses to cross examination. Therefore, legally speaking, the evidence adduced in the manner cannot be used in evidence against the Appellant. Thus, the enquiry proceedings, the recommendations made on the basis of such proceedings and the impugned order, are illegal/ void abinitio and cannot be pressed into service against the interest of the Appellant. The proceedings are therefore ex-parte and cannot be operated against the Appellant under the legal principle of 'audi altram partem'.

d. That the learned Inquiry Officer has (intentionally) omitted recording statements of very material witnesses despite insistence of the Appellant, therefore, by doing so, the learned Inquiry Officer has not only exhibited his undue malice against the Appellant but has damaged the very veracity of the enquiry proceedings.

e. That no independent ocular or circumstantial evidence could be brought on record to bring home the guilt of the Appellant. The witnesses examined are biased and have motive to implicate the Appellant in a concocted charge to save the skin of a drug peddler.

f. That the punishment awarded to the Appellant is not commensurate with the unproved concocted allegations of the Complainant party and is grossly violating the ratio settled in the case law reported as (1988) PLC(CS) Page 179. The superior Constitutional courts have ruled in many cases that while awarding punishment of an officer of the State, it should be seen that the same is commensurate with the guilt brought home against such officer. This element of the ratio settled by the Constitutional Courts is missing in the case.

g. That the enquiry report has in way maligned the Police force on the basis of a Complaint by a party involved in drug trafficking/service and has dented the moral of other officers who may face similar situation in the future. This has

ATTSTED

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caused irreparable damage to the integrity of the force in general and the IOs in particulars.

h. That the inflicting of punishment of dismissal from service is violation of Rule 16.2 of Police Rules, 1934, therefore the impugned order is to be struck down and the Appellant re-instated in service.

i. That the enquiry proceedings have not been conducted in accordance with the spirit of law and rules, therefore, the same are not effective against the interest of the Appellant.

The inquiry proceedings have not been conducted as per law, within the meaning of police rules 1975. It has been held by superior court, relevant observation is as under:-

"Sketchy inquiry is not sufficient to prove any charge against appellant - no witness was examined in inquiry proceedings - appellant was found guilty by inquiry officer without any substantive evidence - impugned order was set aside".

k. The alleged charge is not justifiable and is considerable on the following few stances:

1. The appellant was not associated with departmental inquiry proceedings, conducted by Worthy Inquiry officer, which as per law is without lawful authority hence is not tenable.
2. The worthy Inquiry Officer examined witnesses but the appellant was not given the opportunity of cross examination thus the proceedings are void abenitlo, not tenable.
3. The principle of natural justices would be violated only when an action is taken against a person without his knowledge (NLR 214 April QTA). It has been held by Hon'ble Court that without knowledge, conviction is illegal and it was set aside (NCR 2004 (Feb P-84 Peshawar). I swear that I have not received the alleged money from the applicant and whatever he has said, just he is trying to save the skin of his son Amir from clutches of law.
4. Witness Miss Nayab Ramzan ASP Hayatabad has clearly stated before the worthy inquiry officer "that she was not aware of any involvement of the appellant and if she was cognized of such

ATTESTED

involvement she would have promptly initiated an impartial inquiry against him" hence being a responsible officer, her statement should have been given weight and not to be discarded.

- 5. No direct evidence as per recorded statement by the Inquiry officer is available to substantiate the alleged charge.
- 6. Since the appellant has joined this august force, he performed dedicatedly, honestly, efficiently and to the entire satisfaction of superiors, acted beyond the call of duty at the risk of his life. The awarded penalty shall cause irreparable loss to the appellant and his family.
- 7. Findings of worthy inquiry officer is based on hearsay as no direct or indirect evidence is collected and brought on record to connect the appellant with alleged act of misconduct (2005 PLC (C.S) page 559).

PRAYER

Foregoing in view, it is humbly prayed that by accepting this appeal, the impugned order dated 09.02.2024 (dismissal from service) may very kindly be set aside and the appellant reinstated in service, to meet the ends of justice.

Sincerely yours



Ex- Inspector Humayoon Khan
(Appellant)

0333-2223580
0321-9055670

S.S.
04/03/24


ATTSTED



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

34

I

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by Ex-Inspector Hamayun Khan No. MR/30 (hereinafter referred to as Petitioner).

He was issued Show Cause Notice by CCPO Peshawar on the allegations that as per enquiry conducted by SSP Investigation he was found guilty on account of complaint registered by complainant namely Larin Shah s/o Zafar Khan alleging therein that he demanded money of Rs. 550000/- from the complainant and received the said amount for favoring his arrested son from whom synthetic drugs were recovered in huge quantity. Perusal of the case file revealed that no significant efforts have been made by him to unearth the whole gang, arrest its members and make further recovery of drugs. CCPO/Peshawar awarded him major punishment of dismissal from service.

A meeting of Appellate Board was held on 17.05.2024 in CPO under the chairmanship of Additional IG Headquarters. Ex-Inspector Hamayun Khan No. MR/30 was present and heard in detail.

He was heard in person. The Board accepted his revision petition by modifying the major punishment of dismissal from service into major punishment of rank reversion i.e. from Inspector to Sub-Inspector. He is reinstated into service with immediate effect. The out of service period is treated as leave without pay.

Sd/-

(AWAL KHAN) PSP

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

No. S/ 1352-56/24.

dated Peshawar, the 23-05-2024.

Copy of the above is forwarded to the:

1. Capital City Police Officer, Peshawar. One Service Roll, One Service Book, One Enquiry File (original) containing pages (262) of the above named Inspector received vide your office memo: No. 5071.EC-II, dated 20.03.2024 is returned herewith for your office record.
2. PA to Addl: IGP HQs: Khyber Pakhtunkhwa, Peshawar.
3. PA to DIG: HQs: Khyber Pakhtunkhwa, Peshawar.
4. Office Supdt: E-II, CPO Peshawar.



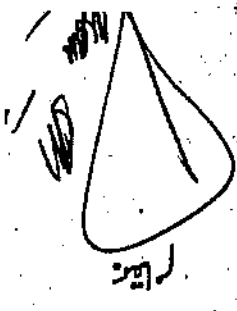
(SONIA SHAMROZE KHAN)
PSP

AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
Khyber Pakhtunkhwa, Peshawar

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ATTSTED



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Accepted
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2009 06 01
الوقت

مقدمہ میں بیان شدہ مسائل کے حل کے لیے درخواست کی گئی ہے۔
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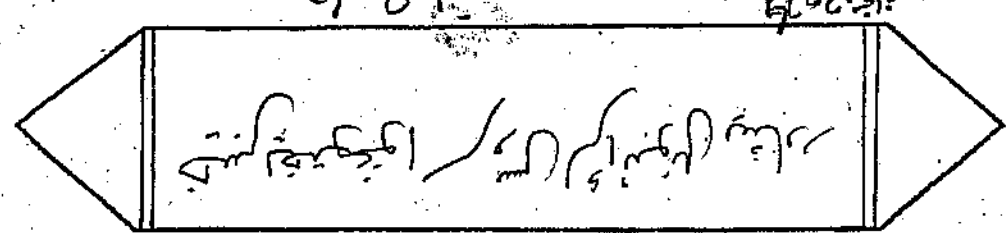
3-2483017414 CN

عالمی مال

مقدمہ میں بیان شدہ مسائل کے حل کے لیے درخواست کی گئی ہے۔

مقدمہ میں بیان شدہ مسائل کے حل کے لیے درخواست کی گئی ہے۔

مقدمہ میں بیان شدہ مسائل کے حل کے لیے درخواست کی گئی ہے۔



مقدمہ میں بیان شدہ مسائل کے حل کے لیے درخواست کی گئی ہے۔

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