BEFORE THE HON'BLE, KHYBERPAKHTUNKHWA, SERVICE TRIBUNAL PESHAWAR

Service appeal No.597/2024

M. Muneeb No.1098 .... Appellant

VERSUS

Inspector General of Police KPK and others .... Respondents

INDEX

Through Respondent

(KHYAL ROZ KHAN)
DSP/Legal SSU (CPEC),
Peshawar.
17301-2507764-1
0315-9867946

23-07-24
Peshawar

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

(1)

Service Appeal No. 597/2024

Muhammad Muneeb ..... (Appellant)

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa etc ..... (Respondents)

PRELIMINARY OBJECTIONS: -

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

Facts

I. Correct, only to the extent that the appellant was appointed as Constable Vide DPO Swabi Order No.11740-44/OASI dated 31.12.2019, his recruitment being done against seats allocated for SSU (CPEC) as per spirit of CPO Peshawar instruction issued vide letter No.9534-71/E IV dated 02.10.2019 as per Police rules, 1934, appointments shall only be done by the District Head of Police. **Copies of E IV Letter, appointment order along with list of Vacancy position of Constables for SSU Unit are attached as annexure "A, B,".**

II. Pertains to transfer of the appellant from District Swabi to SSU in accordance with law as he is liable to perform duties in any Branch, bureau and section etc. Furthermore, the appellant was recruited against allocated seats of SSU as already explained vide above para. It is incorrect that he was on deputation or he was transferred within same departmental as per KP Police Act, 2017.

III. Incorrect, brief facts of the case are that the Constable Muhammad Muneeb No.1098 had committed misconduct by violating Rule-34(A) of the Khyber Pakhtunkhwa Government Servant (conduct) Rules, 1987 as well as chain of command by sharing statement on social media (Facebook app) against Worthy Inspector General of Police and other senior Police officers. The said constable had also violated rules 14.30 of Police rules,1934, by involving in politics and sharing political posts on his personal Facebook account.

In this regard, he was issued Charge Sheet and Summary of Allegation vide SSU (CPEC) Establishment office Endst: No. 587/EC dated 28.02.2024 and proper departmental enquiry was initiated against the appellant and Mr. Shah Mumtaz SP Security Rashakai Economic Zone was nominated as enquiry officer. During the course of enquiry, the statement of appellant was recorded. Report of Special Intelligence Wing (SIW) SSU (CPEC) and copy of uploaded post on Facebook page were collected in USB as well. After completion of all codal formalities, the EO submitted his finding report, wherein he recommended him for Major punishment. During the course of the enquiry, by showing intransigent behavior, Constable Muhammad Muneeb shared/ uploaded a video against his seniors for second time thus violating rules once again however, all aforementioned uploaded videos have been saved in USB by the Enquiry officer and USB is available in enquiry file. Final Show Cause Notice was issued to appellant by the competent authority who summoned him for personal hearing in the orderly room held on 07.03.2024. Despite being given ample opportunities, but he failed to extend cogent explanation in his defense.

Keeping in view all the above facts as well as recommendation of the enquiry officer & material available on the record, the appellant was found guilty of the gross misconduct. Therefore, the respondent No.03 as being the competent authority in the exercise of powers vested to him under section 5(4) of Khyber Pakhtunkhwa, Police rules 1975 (amended in 2014) awarded the appellant major punishment of "**Dismissal from Service". (Copies of SIW report, charge sheet and statement of the appellant along with cross examination, finding report, Final show cause notice, reply of show cause notice, Dismissal order dated 11.03.2024 and rejection order dated 01.04.2024 are attached as annexure C, D, E, F, G, K, I, J).**

IV. Incorrect, the appellant's reply to the Charge Sheet was not cogent as he violated rules 34 (A) of the KPK servant conduct rules, 1987 as well as chain of command by sharing statement on social media (Facebook) against respondent No.01 and he also violated rules, 14-30 of police rules 1934, by involving in politics and sharing political posts on his personal Facebook account.

V. Incorrect, the appellant was served with Final Show Cause Notice to which his reply was unsatisfactory and wherein he also confessed that he uploaded a video message on social media.

VI. Incorrect, the departmental appeal preferred by the appellant before respondent No.02 has been rejected in accordance with law & rules. Vide order No 929-32/EC dated 01.04.2024. Thus instant appeal is liable to be dismissed on following grounds.

Grounds

A. Incorrect, the dismissal order has been passed after completion proper departmental enquiry & recommendation of the EO in accordance with law & rules.

B. Incorrect, the appellant was given ample opportunities for personal hearing but he failed to satisfy the competent authority and he has been treated in accordance with law & rules.

C. Incorrect, the dismissal and rejection orders have been passed by the respondent in accordance with law & rules.

D. Incorrect, the appellant was issued Charge Sheet and Summary of Allegation and he was directed to submit his written reply within seven days.

E. Incorrect, the appellant was summoned for personal hearing, held on 07.03.2024 in orderly room but the appellant failed to extend plausible explanation in his defense.

F. Incorrect, opportunity of cross examination has been given to the appellant as per law before issuance of dismissal order.

G. Incorrect, after conducting proper departmental enquiry and recommendation of the EO, the appellant was dismissed from service.

H. Incorrect, the appellant was issued Charge Sheet & Summary of Allegation for misconduct of sharing political posts on social media and violating chain of command.

I. Incorrect, the appellant has committed gross misconduct twice. Even during course of enquiry, the appellant shared/ uploaded a video against his seniors.

J. Incorrect, dismissal& rejection orders have been issued in accordance with law & rules.

K. That the respondents may also be allowed to raise additional grounds at the time of arguments before the Hon'ble Service Tribunal.

Prayers

In view of above, it is humbly prayed that the instant appeal may kindly be dismissed, being devoid of merits, please.

DEPUTY COMMANDANT
SSU (CPEC),
Khyber Pakhtunkhwa Police,
Peshawar.
(Respondent No.03)
(TARIQ IQBAL)PSP
incumbent

COMMANDANT SSU (CPEC)
Khyber Pakhtunkhwa, Police
Peshawar
(Respondent No.02)
(IRFAN TARIQ)psp
incumbent

DIG LEGAL, CPO
For Inspector General of police Khyber
Pakhtunkhwa, Peshawar
(Respondent No.01)
(DR.MUHAMMAD AKHTAR ABBAS)psp
incumbent

BEFORE THE HONRABLE KHYBER PAKHTUNKHWA.

SERVICE TRIBUNAL PESHAWAR

(5)

Service appeal No 597/2024

Muhammad Muneeb No.1098 .... Petitioner

VERSUS

IGP/KPK and others .... Respondents

AUTHORITY LETTER

Mr. Khyal Roz DSP/Legal, SSU (CPEC), Khyber Pakhtunkhwa, Peshawar is authorized to submit Para-wise Comments/reply in above captioned service appeal on behalf of respondents in Hon'ble Service Tribunal Khyber Pakhtunkhwa, Peshawar.

DEPUTY COMMANDANT
SSU (CPEC),
Khyber Pakhtunkhwa Police,
Peshawar.
(Respondent No.03)
(TARIQ IQBAL)psp
incumbent

COMMANDANT SSU (CPEC)
Khyber Pakhtunkhwa, Police
Peshawar
(Respondent No.02)
(IRFAN TARIQ)psp
incumbent

DIG LEGAL, CPO
For Inspector General of police Khyber
Pakhtunkhwa, Peshawar
(Respondent No.01)
(DR.MUHAMMAD AKHTAR ABBAS)psp
incumbent

(6)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL, PESHAWAR

Service appeal No.597/2024

M. Muneeb No: 1098----------(Appellant)

VERSUS

Provincial Police Officer KPK/ Peshawar and others----------(Respondents)

AFFIDAVIT

I, Tariq Iqbal Dy: Commandant of SSU (CPEC) do hereby solemnly affirm on oath that the content of service appeal on behalf of Inspector General of Police, Khyber Pakhtunkhwa, Peshawar and others are correct to the best of my knowledge and belief. Nothing has been concealed from this Honorable Court.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/lost.

ATTESTED

Distt: Courts
OATH COMMISSIONER
Peshawar
4/7/024

(TARIQ IQBAL) PSP
DEPUTY COMMANDANT
SSU (CPEC)
Khyber Pakhtunkhwa, Police
Peshawar
(Respondent No.3)

(7)

OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR.

No. 9531-71 /E-IV dated Peshawar the 02/10/2019

Attested
DSP/L-SSU-CPR

To: The Capital City Police Officer,
Peshawar.

All Regional Police Officers,
Khyber Pakhtunkhwa.

All District Police Officers,
Khyber Pakhtunkhwa.

Subject:- **RECRUITMENT OF CONSTABLES IN KP POLICE THROUGH ETEA**

Memo:

The Educational Testing Evaluation Agency (ETEA) has announced provisional result of Physical and Written test for the post of Constable in Police Department. The DPOs should collect the result alongwith complete profiles of successful candidates from this office for initiation of recruitment process.

The Competent Authority has ordered that the following instructions may please be followed while enlisting the candidates who have qualified ETEA written and physical test for recruitment as Constable.

1. **Available Vacancies**

   i. The district-wise detail of available vacancies is enclosed herewith as ready reference. The DPOs to call the candidates for Psychological Tests / Interviews as proposed against the vacancy position of each District.

   ii. Recruitment on all available vacancies shall only be done by the respective district. The vacancies shown against Elite Force will be created by transferring the same number of constables by the respective districts to this unit. The seats thus falling vacant shall be filled through fresh recruitment as shown in the "Total" column in the attached list.

   iii. In case of FRP, the candidate shall be enlisted by the respective districts against the vacancies shown in the list. Subsequently, the candidates enlisted against these FRP vacancies shall be transferred to FRP.

   iv. The candidates against allocated seats for SSU (CPEC) may be finalized. However, their salaries notification, separate guidelines shall be issued from the CPO Peshawar.

2. **Validity of Merit List up-to 31st December 2019**

   The waiting list of the candidates in order of merit as prepared by the ETEA should be displayed on prominent places in all Police offices. The waiting list would remain valid till **31st December 2019** and any occurring vacancy in the district will be filled by picking up candidates from the waiting list in order of seniority.

3. **Verification of additional/qualification marks & Special Quota.**

   The Regional Police officers shall personally ensure and verify all the additional/ qualification marks given to the candidates and also verify the claimants of special quota like police sons, females and minorities.

   The RPOs shall also be responsible for data validation of the result announced by the ETEA after checking all the relevant documents of the candidates.

4. **Psychological Test**

Psychological Tests/Interviews of the qualified candidates shall be conducted through qualified Psychologist before issuing enlistment orders. For Psychological Tests/Interviews, Senior Psychologist Ex-ISSB has been nominated by CPO who will conduct Tests/Interviews at Regional HQrs. All the OASI has directed to bring profile pages of all the candidates at the time of Interview who qualified in Physical/Written Test already provided by ETEA authorities.

Attested
DSP/L.SSU-CPO

5. **Allocation of Quota to Police Sons, Females, Minorities, Followers, etc.**

Females, Minorities and Police Sons and Police Follower Staff candidates who cannot be adjusted on the merit seats shall be adjusted as per their allotted quota in order of their respective merit in each district.

i. Following is the ratio/percentage of quota of each category:

Police Sons:	**10% of the available seats**
Female:	**10% of the available seats**
Minorities:	**03% of the available seats**
Followers Staff:	**02% of the total strength of followers in the respective district**

6. **Determination of seniority in case of equal marks**

In case where two or more candidates have secured the same marks (i.e. 72), the order of merit among such candidates shall be determined first by seniority in age. In case such candidates have the same date of birth also, then higher qualification shall determine the order of merit.

7. **Time-line for completion of Recruitment Process**

All RPOs/DPOs shall complete the recruitment/enlistment process before 31st December, 2019.

This issue with the approval of Competent Authority.

(SADIQ BALOCH) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

No. 9534-71 /E-IV dated 02-10.2019

Copy to the:-

1. Addl: IGP HQrs, Khyber Pakhtunkhwa, Peshawar.
2. Addl: IGP/Special Branch, Khyber Pakhtunkhwa, Peshawar.
3. DIG/HQrs, Khyber Pakhtunkhwa, Peshawar.
4. Major Mian Muhammad Saleem Shah (R), Senior Psychologist
5. COS to IGP, Khyber Pakhtunkhwa, Peshawar.

VACANCY POSTION OF CONSTBLE 2019 IN DISTRICT OF KHYBER PAKHTUKKHWA

S#	District/ Unit	Vacancy Regular FC	Elite Force	FRP FC	SSU(CPEC) Vacancy FC	Total
1.	Mardan	40	0	0	224	264
2.	Charsadda	15	0	0	90	105
3.	Nowshera	272	02	0	98	372
4.	Swabi	0	0	0	81	81
	Total	**327**	**2**	**0**	**493**	**822**
5.	Swat	167	03	0	206	376
6.	Shangla	0	0	03	59	62
7.	Bunir	15	0	0	73	88
8.	Dir Upper	49	0	0	93	142
9.	Dir Lower	16	02	0	150	168
10.	Chitral	0	0	3	80	83
	Total	**247**	**5**	**6**	**661**	**919**

POLICE DEPARTMENT

DISTRICT SWABI

ORDER

Consequent upon recommendation/Selection through Educational Testing and Evaluation Agency (ETEA) 2019 & CPO Peshawar letter No.9534-71/E-IV, dated 02.10.2019, the following candidates who qualified all stages of recruitment and as per merit list of Educational Testing and Evaluation Agency (ETEA),after verification of antecedent and medical examination/Fitness are hereby recruited as Constables in BPS -07 RS: (10990-610-29290) on three years' probation period with immediate effect. They are allotted Constabulary No,s as noted against each name:

S#	ETEA Merite List	Name	Father's Name	CNIC	R/O	Physical Measurement		Date of Brith	Edu:	Allotted NO.
						Height	Chest			
1	1	Aamir Ahmad	Muhammad Ali	16202-2027438-5	Moh: Manan Khel Kalu Khan	5'-9 ½ "	33"x 34 ½ "	20.04.1998	BA	1321
2	2	Muhammad Tufail	Haroon	16201-9859089-9	Subidar Kaly Dobian	5'- 7 ¼ "	35"x36 ½ "	06.04.1996	FA	1322
3	3	Fazal Subhan	Aman Khan	16204-0373168-1	Moh: Mama Khel, Shera Ghund	5'-9"	35"x37"	06.03.1997	FSC	1323
4	4	Muhammad Ayaz	Faqir Muhammad	16202-8443327-9	Moh: Mazam Khel, Swabi	5'-10 ½ "	35"x37 ½ "	05.02.1999	FSC	1324
5	5	Muhammad Jamal	Ahmad Gul	16202-3923978-5	Moh: Chota Khazana Marghuz	5'-7"	34"x35"	01.01.1999	FSC	1325
6	6	Zohaibullah	Fida Ullah	16203-0396809-1	Moh: Gula Khel, Kalabat	5'-9"	33"x35"	12.07.1998	DAE	1326
7	7	Muhammad Numan	Muhammad Amin	16202-1972894-9	Moh: Kala, Parmoli	5'-10 ¼ "	35"x37"	15.03.1999	FSC	1327
8	8	Syed Jawad Ali Shah	Syed Liaqat Ali Shah	16201-5829397-3	Vill: Pak Kaya, Hand	6'-1 ½ "	33"x35"	20.03.1995	MA	1328
9	9	Mubassir Khan	Muhammad Younas	16202-1867494-7	Moh: Khat Kaly, Kalu Khan	5'-11 ½ "	33"x35"	01.04.1995	MA	1329
10	10	Sulaiman	Bakht Wali Shah	16202-1420214-3	Moh: Ismail Khel, Shekh Jana	5'-7 ½ "	34"x36"	03.03.1996	BA	1330
11	11	Taimoor Khan	Gul Badshah	16201-1518228-9	Moh: Mira Khel, Yar Hussian	5'-9"	41"x42"	20.03.1998	FSC	1331
12	12	Muhammad Hassan	Naseem Gul	16202-3963418-1	Moh: Shera Ghund	5'-8 ½ "	33"x34 ½ "	02.01.2000	FSC	1332
13	13	Tasir Ullah	Saeed Ullah	16201-8524653-1	Vill: Baghe Haram, Dagi	5'-7"	33"x35"	20.03.1999	FSC	1333
14	14	Nasir Ali	Sherin Zada	16204-0392191-9	Moh: Kara Khel, Shekh Jana	5'-9"	33"x34 ½ "	01.04.1999	FSC	1334
15	15	Hussian Ahmad	Jehangir Khan	16201-6386203-1	Moh: Narshak, Dobian	5'-8"	33"x35"	07.12.1999	FA	1335
16	16	Bahar Ali	Ahmad Ali	16201-1767253-5	Vill: Yar Hussian	5'-11"	34"x36"	02.01.1996	FSC	1336
17	18	Aamir Tufail	Faqir Hussian	16202-8210372-3	Moh: Khwaja was Khel, KSK	5'-8 ¼ "	33"x35"	16-03.1996	MA	1337
18	19	Gohar Muhammad	Nisar Muhammad	16202-5928068-1	Moh: Qamar Dand, Naranji	5'- 7 ½ "	33"x35"	20.03.1997	FA	1338
19	20	Shahzad Khan	Syed Johar	16204-0400339-7	Moh: Ameer Khel, Turlandi	5'-10"	33"x35"	02.03.1998	FSC	1339
20	21	Wakeel Ahmad	Awal Sher	16201-6655790-3	Moh: M.Khel, Yar Hussain	5'-7 ¾ "	33"x34 ½ "	05.03.1998	FSC	1340

Attested
DSP/L-SSU CPBC

(10)

E DEPARTMENT

DISTRICT SWABI

S.#	ETEA Merite List	Name	Father's Name	CNIC	R/O.	Physical Measurement		Date of Brith	Edu.	Allotted NO.
						Height	Chest			
21	22	Shabir Ahmad	Amir Jehan	16202-2651900-7	Vill: Mehrali, Parmoli	5'-7 ¼ "	35"x37"	27.03.1999	FSC	1341
22	23	Muhammad Salman Khan	Mukhtiar Muhammad	16201-1362395-7	Moh: Gul Abad, Yar Hussain	5'-8 ¼ "	33"x35"	31.01.1998	FSC	1342
23	24	Muhammad Sajid	Rehman Ullah	13503-8188557-9	Moh: Chitta Batta, Sidasar, Mansehra	5'-9"	33"x34 ½ "	12.03.1999	FSC	1343
24	25	Muhammad Mustafa	Sardar Ali	16202-7900342-7	Vill: Ismaila , Swabi	5'-8"	33'x35"	10.04.1999	10th	1344
25	26	Abdul Basit	Sufaid Shah	16201-9907175-5	Moh: Malak Cham, Jalsai	5'- 7 ½ "	33 ½ "x 35"	03.03.2000	10th	1345
26	27	Fawad	Shams Ur Rahman	16202-6305347-5	Kalu Khan ,Swabi	5'- 9 ½ "	38"x40"	10.02.1995	MSC	1346
27	28	Muneer Ali	Zarsheed Ali	16202-8799646-3	Moh: Sadeen Khan, Banzara KSK	5'-7"	35"x36 ½ "	17.09.1996	FSC	1347
28	29	Muhammad Talha	Malak Taj	16204-0404661-9	Kalu Khan ,Swabi	5'-8"	33"x34 ½ "	01.04.1999	FSC	1348
29	30	Shah Fahad	Zar Said	16202-2348366-3	Moh: Parrah, Kalu Khan	5'-7"	33"x35"	07.04.1994	FA	1349
30	31	Aman Ullah	Umra Khan	16204-0398340-9	Vill: Gango Dher, Shewa	5'-9"	33"x35"	05-04.1996	MSC	1350
31	32	Muhammad Behram Khan	Lal Sher	16201-8601463-1	Moh: Malak Cham, Jalsai	5'-7 ½ "	37"x38 ½ "	06.05.1997	BSC	1351
32	33	Afaq Ikhtisham	Ikhtisham Ul Haq	16201-3111168-3	Vill: Tordher, Lahor	5'-8 ½ "	35"x37"	23.12.1998	FSC	1352
33	34	Irshad Khan	Raidullah Khan	16204-0389824-5	Moh: Bazid Khel, Parmoli	5' -7 ½ "	33"x35"	15.03.1999	FSC	1353
34	35	Adnan Ahmad	Gul Sher Khan	16201-9172680-7	Moh: Adda, Vill: Manki	5'-9"	33"x35"	20.03.1999	10th	1354
35	36	Muhammad Hamza	Muhammad Ali	16204-0390039-1	Vill: Turlandi, Swabi	5'-8"	33"x35 ½ "	01.04.2000	FA	1355
36	37	Mehmood Ali Khan	Nawab Ali Khan	16202-6861736-5	Moh: Mazed Khel, Maneri Payan	5'-9"	36"x38"	04.04.1996	FSC	1356
37	38	Farooq Ahmad	Sultan Sher	16202-1313469-7	Kalu Khan ,Swabi	5'-9"	36"x38"	20.03.1997	FSC	1357
38	39	Muzamil Ahmad	Aurang Zaib	16204-0408907-3	Moh: Manan Khel Kalu Khan	5'-7"	33"x35"	30.03.1997	BA	1358
39	40	Muhammad Awais	Qamash Gul	16201-0279980-5	Moh: Khunzadgan, Dobian	5'-8"	33"x35"	16.02.1999	FSC	1359
40	41	Aamir Ali	Munfat Khan	16201-6365988-7	Moh: M. Khel, Yar Hussain	5'-8 ½ "	33"x34 ½ "	30.03.1999	10th	1360
41	42	Muneeb Ali	Zahir Dad	16201-7610404-9	Yar Hussian, Swabi	5'-9 ¼ "	38"x40"	12.04.1995	BSC	1361
42	43	Jawad Ali	Khanimullah	16202-5015966-9	House#.90 N/C L Colony Mardan	5'- 9 ½ "	33"x35 ½ "	16.12.1995	FSC	1362
43	44	Mohsin Abid	Zain Ul Abidin	16202-3180093-5	Bam Khel Swabi	5'-10 ½ "	35"x37"	05.03.1996	MSC	1363
44	45	Uzair Sufian	Mian Said Khan	16203-0375217-7	Dewal, Gandoon Topi	5'-7 3/4"	35"x37"	19.03.1998	FSC	1364
45	46	Muhammad Abdullah	Abdul Ahad	16204-0404410-7	Moh: Parrah, Kalu Khan	5'-8"	36"x38"	30.10.1998	FSC	1365
46	47	Mansoor Ali	Shaukat Ali	16202-7846024-5	Moh: Mama Khel, Kalu Khan	5'-7"	34"x36"	20.03.1999	FA	1366

District Police Officer

Attested
DSP/L.S.S.U-CPEC

(11)

OLICE DEPARTMENT

DISTRICT SWABI

S.#	ETEA Merite-List	Name	Father's Name	CNIC	R/O	Physical Measurement		Date of Brith	Edu	Allotted NO
						Height	Chest			
47	48	Junaid Khan	Marakib Khan	16202-9561593-3	Vill: Rafiq Abad,KSK , Razzar	5'-8"	34"x36"	15.03.2000	10th	1367
48	49	Hazrat Ali	Ali Jan	16204-0392360-3	Moh: Landay Cham, Sheikh jana	5'-9"	33"x36"	22.03.2000	FSC	1368
49	50	Sajjad Hussain	Odan Shah	16201-6476632-5	Moh: Karim Dad Khel, Yar Hussain	5'-7"	33"x35"	02.01.1996	DAE	1369
50	51	Ikhtisham	Said Anwar	16201-2952121-7	Moh: Dhok, Lahor	5'-11"	33"x35"	18.01.1996	BA	1370
51	52	Muhammad Fawad Khan	Misal Khan	16202-2993721-7	Vill: Adina , Swabi	6'-00"	33"x34 ½ "	30.03.1996	MSC	1371
52	53	Muhammad Muneeb	Wareed Khan	16202-3680115-7	Moh:Akhun Khel, Kaddi, Zaida	5'-8 ¼ "	33"x35"	17.11.1996	DAE	1372
53	54	Ishtiaq Ahmad	Gul Aman Ud Din	16201-2918899-7	Vill: Jaganath, Yar Hussain	5'-7"	35"x37"	15.04.1997	BA	1373
54	55	Muhammad Adan	Gulistan	16204-0378724-1	Moh: Manan Khel Kalu Khan	5'-10"	33"x35"	08.03.1998	FA	1374
55	56	Ayaz Khan	Falak Sher	16202-6818651-3	Vill: Kalu Khan ,Swabi	5'-10"	35"x37"	12.03.1998	FSC	1375
56	57	Hamid Ali	Fida Muhammad	16204-0407763-1	Vill: Kalu Khan ,Swabi	5'-11 ½ "	33"x34 ½ "	15.01.1999	FSC	1376
57	59	Shawal Shehzad	Faqir Zada	16202-0215755-9	Moh: Mena Banda, Maneri Bala	6'-00"	35"x38"	27.04.1999	FSC	1377
58	60	Maaz Ali	Wisal Muhammad	16202-8821772-7	Moh: Manan Khel Kalu Khan	5'-8 ½ "	33"x35"	05.02.1995	FSC	1378
59	61	Zain Ul Abidin	Zar Bacha	16202-3726234-9	Vill:Kalu Khan ,Swabi	5'-8 ½ "	34"x36"	18.12.1995	FA	1379
60	62	Sadique Ahmad	Khan Muhammad	16202-4076606-3	Moh: Umbara Khel, Parmoli	5'-7"	33"x35"	01.02.1996	BA	1380
61	63	Muhammad Faisal Tariq	Muhammad Tariq Khan	16202-2145992-9	Moh: Nobat Abad, Kotha, Topi	5'-10"	35"x38"	22.02.1997	BA	1381
62	64	Shah Fahad	Abdur Rasheed	16202-8068367-9	Moh: Bazid Khel, Kalu Khan	5'-7 ¼ "	33"x35"	02.04.1997	FA	1382
63	67	Junaid Khan	Amir Gul	16201-2826933-7	Moh: Jan Khel, Yar Hussian	5'-9 ½ "	33"x34 ½ "	30.03.1999	FSC	1383
64	68	Izaz Ali	Murad Ali	16202-9817843-7	Vill: Turlandi, Swabi	5'-10"	34"x37"	07.02.1995	BA	1384
65	69	Mudassir	Abdus Salam	16202-7986620-7	Vill: Takhta Band, Kalu Khan	5'-7"	33"x35"	07.02.1996	BA	1385
66	70	Muhammad Adil	Muhammad Iqbal	16202-0816583-3	Moh: Karam Khel, Kala Swabi	5'-10"	33"x35"	09.01.1998	FSC	1386
67	71	Amjid Ali	Muhammad Islam	16202-4235552-3	Moh: Rakh Banda, Zaida	5'-9"	33'x35"	15.02.1998	10th	1387
68	72	Shehriyar Gohar	Gohar Ali	16202-8286381-1	Moh: Manan Khel Kalu Khan	5'-10 ½ "	35"x38"	13.02.1999	FSC	1388
69	73	Adil Khan	Zubair Khan	16204-0354556-9	Moh:Khadar khel, Adina	5'-9 1/2"	33"x35 ½ "	15.01.1995	BA	1389
70	75	Shah Faisal	Murad Khan	16202-1728526-1	Parmoli, Razzar, Swabi	6'-00"	37"x40"	10.02.1998	FA	1390
71	76	Muhammad Farhan	Muhammad Yousaf Khan	16202-3226771-5	Moh: Islam Abad, Gar Munara	5'-9 ½ "	33"x34 ½ "	21.03.1998	FSC	1391

District Police Officer

(12)

Attested
DSP/L-SSU-CPEC

POLICE DEPARTMENT

DISTRICT SWABI

S.#	ETEA Merite List	Name	Father's Name	CNIC	R/O	Physical Measurement Height	Physical Measurement Chest	Date of Brith	Edu:	Allotted NO.
					POLICE SONS 10% QUOTA					
72	78/P	Zuhad Amin	Roohul Amin	16202-6863828-9	Moh: Saleem Khan, Swabi	5'-8"	33"x34 ½ "	15.03.1999	FSC	1392
73	97/P	Muhammad Idrees	Maskeen Shah	16202-7654868-3	Moh: Munan Khel, Kalu Khan	5'-9"	33"x34 ½ "	29.03.1996	BA	1393
74	98/P	Numan	Fazal Amin	16202-7631879-7	Moh: Babi Khel, Ismaila	5'-9"	34"x36"	07.04.1996	FSC	1394
75	102/P	Muhammad Adil	Muhammad Shoaib	16204-0377880-9	Moh: Parrah, Kalu Khan	5'-10".	36 ½ "x38"	09.01.1998	FSC	1395
76	110/P	Shah Fahad	Muhammad Sher	16204-0425961-5	Moh: Mama Khel, Kalu Khan	5'-7"	37"x38 ½ "	05.03.2000	10th	1396
77	112/P	Musawar Zaman.	Laiq Zaman	16204-0398759-9	Vill: Turlandi, Swabi	5'-8"	33"x34 ½ "	13.03.2000	FSC	1397
78	122/P	Munsif Ali	Muhammad Ishaq	16204-0400677-1	Moh: Shagai, Turlandi	5'-9"	33"x35 ½ "	25.02.2000	FSC	1398
79	124/P	Babar Zaib	Muhammad Zaib	16202-5871879-5	Moh: Loda Khel, Kalu Khan	6'-00"	33"x35"	21.04.2000	FSC	1399
					LAIDES 10% QUOTA					
80	155/F	Sumaira	Abdul Hakeem	16203-0625784-0	Moh: Kund, Gabasni, Topi	5'-2"	x	05.02.1996	FA	1400
81	156/F	Uroosa	Wahdat Khan	16202-9846483-8	Moh: Karam Khel, Kala Swabi	5'-5"	x	01.04.1996	BA	1401
82	167/F	Amaiza Murad	Murad Ali Shah	16203-0640982-6	Moh:Redawan, Maini	5'-4"	x	15.02.1999	FSC	542
83	175/F	Aisha	Muhammad Sarwar	16202-9755808-4	Sugar Mill, NSR House # B40	5-3"	x	01.01.1999	FA	573
84	177/F	Shafaq Pervez	Pervez Muhammad	16201-7173306-0	Moh: Miagan Sudher	5'-2 ½ "	x	19.09.1999	FSC	742

OB NO 1172
Dated: 31 / 12 /2019

District Police Officer
Swabi.

OFFICE OF DISTRICT POLICE OFFICER, SWABI.

No. 11740-44 **/OASI, Dated Swabi** 31 /12 **2019.**

Copy of above is forwarded to the:

1. Inspector General of Police Officer, Khyber Pakhtunkhwa Peshawar for favour of information w/r noted above please.
2. Deputy Inspector General of Police Mardan Region-1, Mardan for favour of information please.
3. District Account Officer, Swabi.
4. Pay Officer Swabi.
5. Establishment Branch Swabi.

(13)

Attested
DSP/L-SSU-CPEC

(14)

انکوائری رپورٹ

جناب عالی!

مغروض خدمت ہوں کہ بحوالہ چٹی انگریزی نمبری 533-48 بمورخہ 22.01.2024 مجاریہ جناب فضل حنیف خان ایس پی ایڈمن اینڈ مینارٹی خیبر پختونخواہ پشاور کے جاری کردہ احکامات کی روشنی میں جملہ سی پیک نفری کو قوائد پولیس رولز باب 14 فقرہ 30 کے تحت شرکت سیاست سے قطعاً منع کیا گیا ہے۔ کنسٹیبل محمد منیب 1098 پلاٹون نمبر 21 ضلع صوابی متعینہ رنگی اکنامک زون نوشہرہ نہ صرف اپنے آفیشل فیسبک آکونٹ (Muhammad Muneeb) سے سیاسی پوسٹ شیئر کرتا ہے بلکہ سی پیک وردی میں ملبوس ہو کے چین آف کمانڈ کو پامال کرتے ہوئے اپنے افسران بالا کے خلاف ویڈیو پیغام میں راشن الاونس بڑھانے کی استدعا کے ساتھ ساتھ ملک پاکستان کے ریاست کے خلاف بھی غیر ضروری ویڈیوز اپلوڈ کرتا ہے۔

Attested
DSP/C-SSU

جناب عالی!
دوران انکوائری رپورٹ مسلم خلاف پولیس رول سیاسی پوسٹ شیئر کرنے ازاں کنسٹیبل محمد منیب 1098 پلاٹون نمبر 21 صوابی بمراد ملاحظہ و ضروری حکم احکام پیش خدمت ہے
1/C-SSU-SSU

Sir,
forwarded pl
SP/A
27/02/24

By Commandant pl.

Office E.C
issue charge sheet
27/2/24

Better Copy of Annexure

(14) "A"

انفارمیشن رپورٹ

جناب عالی!

مغروض خدمت ہوں کہ بحوالہ چھٹی انگریزی نمبری 533-48 بمورخہ 22.01.2024 مجاریہ جناب فضل حنیف خان ایس پی ایڈمن اینڈ مینارٹی خیبر پختونخواہ پشاور، کے جاری کردہ احکامات کی روشنی میں جملہ سی پیک نفری کو قوائد پولیس رولز باب 14 فقرہ 30 کے تحت شرکت سیاست سے قطعاً منع کیا گیا ہے۔ کنسٹیبل محمد منیب 1098 پلاٹون نمبر 21 ضلع صوابی متعینہ رشکئی اکنامک زون نوشہرہ نہ صرف اپنے آفیشل فیسبک اکاونٹ (Muhammad Muneeb) سے سیاسی پوسٹ شئیر کرتا ہے بلکہ سی پیک وردی میں ملبوس ہو کے چین آف کمانڈ کو پامال کرتے ہوئے اپنے افسران بالا کے خلاف ویڈیو پیغام میں راشن الاونس بڑھانے کی استدعا کے ساتھ ساتھ ملک پاکستان کے ریاست کے خلاف بھی غیر ضروری ویڈیوز اپلوڈ کرتا ہے۔

جناب عالی!

موصولہ انفارمیشن رپورٹ بسلسلہ خلاف پولیس رول سیاسی پوسٹ شیئر کرنے ازان کنسٹیبل محمد منیب 1098 پلاٹون نمبر 21 صوابی بمراد ملاحظہ وضروری حکم احکام پیش خدمت ہے۔

دستخطی انگریزی انچارج SIW SSU (CPEC)

15

CHARGE SHEET

I, Deputy Commandant Special Security Unit (CPEC), Peshawar, as competent authority, hereby charge that Constable Muneeb No. 1098 of SSU (CPEC), with the following irregularities.

I. "That you Constable Muneeb No. 1098 had violated Rule-34(A) of the Khyber Pakhtunkhwa Government Servants (Conduct) Rules, 1987 as well as chain of command by sharing statement on social media (Facebook app) against Worthy Inspector General of Police and other senior police officers".

II. "That you had violated police rules 1975, 14-30 by involving in politics and sharing political posts on your personal Facebook account".

Being part of the Disciplined Force, these acts of yours are against the Police Rules & shows gross misconduct on your part.

You are, therefore, required to submit your written defence within seven days of the receipt of this charge sheet to the Enquiry Officer committee, as the case may be.

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

Intimate whether you desire to be heard in person.
A statement of allegation is enclosed.

Attested
DSP/L SSU CPEC

(ABDUR RASHID)PSP
Deputy Commandant,
Special Security Unit (CPEC),
Khyber Pakhtunkhwa,
Peshawar.

28-02-2024

(16)

بیان از ان کنسٹیبل محمد منیب 1078 چارج شیٹ نمبری 587/ مورخہ 28-12-24 محاربہ ڈپٹی کمانڈنٹ صاحب SSU CPEC پشاور

جناب عالی!

① گزارش ہے کہ کنسٹیبل کو چارج شیٹ جاری ہوا ہے جسمیں کنسٹیبل پر الزام لگایا گیا ہے کہ آپ نے چین آف کمانڈ کی خلاف ورزی کی ہے جو کہ سراسر بے بنیاد ہے۔ محکمہ پولیس کے کنسٹیبلان نے کئی مواقع پر اپنے افسران بالا کو واشن الاؤنس بڑھانے کا استدعا کیا ہے جیسا کہ شہداء پولیس کے دن کے موقع پر انسپکٹر جنرل آف پولیس خیبر پختونخوا، وزیر اعلیٰ خیبر پختونخوا اور باقی بالا افسران کی موجودگی میں کیا تھا اسکے علاوہ مختلف اوقات میں مختلف روزنامچوں میں اسکے بارے میں رپورٹس اور درخواست لکھ کے نقل مراسلات افسران بالا کی خدمت میں پیش کی جا چکی ہے لیکن افسران بالا کی طرف سے کسی قسم کا مثبت جواب آیا۔ میں نے ویڈیو پیغام میں اپنے ایک جائز حق کے بارے میں بیان دیا تھا جو کہ ہمارا جائز حق ہے اور وقت کی اشد ضرورت ہے اور نا ملنے کی وجہ سے محکمہ پولیس کے جوبیٹر رینکس پر بہت برا اثر پڑ رہا ہے۔

Attested
DSP/L SSU

② چارج شیٹ میں مذکورہ کنسٹیبل کے خلاف الزام لگایا گیا ہے کہ کنسٹیبل سیاسی سرگرمیوں میں ملوث ہے اور سیاسی پوسٹس اپنے سوشل میڈیا اکاؤنٹ فیس بک سے شیئر کر رہا ہے جو کہ کنسٹیبل کے خلاف ایک منظم پروپیگنڈہ ہے۔ کنسٹیبل کے فیس بک اکاؤنٹ سے کسی قسم کا سیاسی پوسٹ شیئر نہیں ہوا ہے جو پوسٹ چارج شیٹ کے ساتھ لگائے گئے ہیں یہ سب ایڈیٹڈ کی ہوئی پوسٹس ہے جسکے ساتھ کنسٹیبل کا کوئی تعلق نہیں ہے اور یہ کنسٹیبل کو دبانے اور پھنسانے کی ایک منظم کوشش کی جا رہی ہے۔

یہی میرا بیان ہے جو حقیقت پر مبنی ہے اور کوئی بات پوشیدہ نہیں رکھا گیا ہے۔

آپ صاحبان سے گزارش ہے کہ چارج شیٹ کو ختم کیا جائے کنسٹیبل تاحیات دعا رہیگا۔ نوٹ: جملہ ابوابش و درخواست ہمراہ لف ہے۔

العبد

Attested
SP/SSU RSZK

محمد منیب 1078/FC پلاٹون 21 SSU CPEC متعینہ رشکئی اکنامک زون نوشہرہ

رابطہ: 0311-3235235 / 0343-6304014

شناختی کارڈ: 16202-3680115-7

(17)

کیس نمبر 1098/P-21 متعلقہ تھانہ شکئی الٹا ایک زون ضلع نوشہرہ

کراس :

س: آپ نے راشن الاؤنس کے متعلق ویڈیو میسیج بک پر کب اپ لوڈ کیا تھا۔

ج: مورخہ 26/02/2024 کو اپ لوڈ کیا تھا۔

س: مذکورہ ویڈیو میں آپ نے جناب IG صاحب کو مخاطب کرتے ہوئے کیا مطالبہ کیا تھا۔

ج: میں نے جناب IG صاحب سے مطالبہ کیا تھا کہ راشن الاؤنس کو 1000/= روپے سے بڑھا کر حالیہ ضرورت کے مطابق کیا جائے کیونکہ ہمارا راشن الاؤنس بہت ہے جس کی وجہ سے پولیس پرائیویٹ، خان، نواب، جاگیردار کے محتاج بن کر مجبوراً انکے ڈیروں و حجروں میں جا کر روٹی کھاتے ہیں۔ جس سے عوام کا پولیس سے اعتماد اٹھ جاتا ہے اور مقدمات خان، نواب، جاگیرداروں کی اس احسان کی وجہ طرف داری کرتا ہے اور انصاف دینا مشکل ہو جاتا ہے۔ اسی طرح ~~جس کہ~~ پولیس کی سرکاری گاڑی میں تیل نہیں ہوتا اور پولیس مجبوراً پرائیویٹ لوگوں سے گاڑی میں تیل ڈلواتے ہیں اور سرکاری گاڑی کی مرمت وغیرہ بھی کرتا ہے جس کی وجہ سے کرپشن کا بازار گرم ہو جاتا ہے اور پولیس غیر جانبدار کارروائی نہیں کر سکتے اور مجبوراً منشیات فروش و جرائم پیشہ افراد سے مارگننگ کر کے مجبوراً ان سے پیسے لیتے ہیں جو پولیس کی بدنامی کا سبب بنتا ہے۔ چونکہ افسران بالا اور ایس ایچ او کو ان کی سہولیات فراہم کی جاتی ہے اور وہ کنٹینر وغیرہ جات میں بیٹھ کر ہمارے جائز مطالبات پر غور نہیں کرتے جس

PTO

(جاری ہے)

Attested
DSP/L-SSU

Attested
SP SSU. R.2

(18)

سے پولیس کا سوال کرتا ہے اور پولیس کو جو انٹیلی جنس چاہیے
زندگی گزارتا ہے اور غریب و مظلوم کو انصاف ملنا مشکل ہو
جاتا ہے

س: آپ نے پولیس کتنی ہے؟

ج: چار سال 2 مہینے

Attested
DSP/SSU

س: آپ SSU پولیس کے علاوہ کسی اور پولیس ڈیپارٹمنٹ میں
رہ چکے ہیں؟

ج: تقریباً 2 سال تھرل کے بعد میں نے ضلع صرالی میں
ریگولر پولیس ڈیوٹی سرانجام دی ہے۔ اس کے بعد
SSU پولیس جوائن کر گئے۔

Attested
SP. SSU. RZK

س: چار ج سٹیٹ کے دوسری کے بعد اپنے دوسری ریکوری
کی۔

ج: ہاں دو رقم 02 $\frac{03}{024}$ کو میں نے چار ج سٹیٹ بیماری کے
بعد دوسرا ریکوری اپ لوڈ کیا۔ سٹیٹس بک پر

س: میرے ریکارڈ وہ ریکوری جو آپ نے دو رقم 26 $\frac{02}{024}$ کو
اور دوسرا رقم 02 $\frac{03}{024}$ کو سٹیٹس بک پر اپ لوڈ کیا ہے
سنایا۔ کیا یہ دونوں ریکوریز آپ نے جاری کی ہے؟

ج: ہاں میں نے جاری کیا ہے۔ اور اپنے جائز حق کی دفاع میں جائز کیے ہیں۔

س: کیا آپ نے جو مدایہ منظر $\frac{\partial^2 \theta}{\partial x^2}$ کو تفصیل تک پڑھا ہے وہ اپنے تحریری سوال کے جواب کی صورت میں لکھ سکتے ہیں؟

ج: جی ہاں میں لکھ سکتا ہوں جو کہ یوں ہے:

چونکہ میں محکمہ پولیس خیبر پختونخوا کا ملازم ہوں اور میری دلی خواہش ہے کہ پولیس غیر جانبدار اور رشوت سے پاک ہو جائے۔ پولیس میں لوگ جو کرپشن کرتے ہیں وہ مجبوری کی بنا پر کرتے ہیں کیونکہ سہولیات اور مراعات نا ہونے کے برابر ہے۔ محکمہ پولیس میں تفتیش میں رشوت کھلے عام چلتا ہے جو پارٹی زیادہ پیسے دیتا ہے وہ تفتیش اپنا قلم اسکی حق میں استعمال کرتا ہے جس سے ملزمان بہت جلد رہا ہو جاتے ہیں جسکی وجہ سے عوام کے درمیان دن بدن دشمنیاں بڑھتی جا رہی ہے کیونکہ انکے ساتھ انصاف نہیں ہوتا اور لوگ قانون کو اپنے ہاتھ میں لینا شروع کر دیتے ہیں۔ تھانہ جات، ڈسٹرکٹ اور صوبائی پولیس افسران کی تقرری و تبادلے سیاسی اثر رسوخ پر ہوتا ہے اور الزام مجھ پر لگائی جاتی ہے کہ آپ سیاست میں شامل ہو جاؤ۔ ناقص تفتیش جیسا کہ بیسیوں کے عوض آلہ واردات کو تبدیل کرنا، موقع میں ردوبدل کرنا، اثر رسوخ والے ملزمان کو حوالات کی جگہ پر تھانہ میں کمرہ دیکر پروٹوکول دینا اور مظلوم کے ساتھ انصاف نہ کرنا حالیہ بڑھتے ہوئے جرائم کا سبب ہے جسکی وجہ سے عوام پولیس کو گالیاں دیتے ہے حتی کہ ہمارے راہ حق کے شہداء کو بھی عزت کی نگاہ سے نہیں دیکھتے۔

PTO

Attested
DSP/L

Attested
SP. SSG. KPK

Page No 1-

میں یہ چاہتا ہوں کہ ہر کسی کے ساتھ ایک جیسا سلوک کیا جائے تاکہ
VIP ملزم کو پروٹوکول دیا جائے اور غریب کو زیر دفعہ 167 میں
بھی پابند سلاسل کیا جائے۔ آئین پاکستان 1973 میں ہر ایک شہری
کو یکساں حقوق دیا گیا ہے اور عزت بھی۔ پولیس جب کسی شخص
سے اسلحہ وغیرہ برآمد کرتا ہے تو وہ پیسوں کی خاطر سے تبدیل کرتا ہے
جس کی وجہ سے اسلحہ کی نمائش میں دن بدن اضافہ ہوتا جا رہا ہے اسی
طرح منشیات کے پولیس FIR کر کے گروپوں کو بے جا تنگ کرتے ہیں اور اصلی
ملزمان کے ساتھ ڈیل کر کے کھلا چھوڑ دیتے ہیں ان سے پیسے لیتے ہیں جس کی
وجہ سے نوجوان نسل میں نشہ کی عادت دن بدن بڑھتی جا رہی ہے جو کہ
معاشرہ کیلئے اچھا نہیں ہے اور پولیس کی بدنامی کا سبب ہے اور
ان تمام برائیوں کا ذمہ دار کرپشن ہے اور کرپشن کا یہ پیسہ ایک معمولی
سپاہی سے لیکر بالا افسران تک جاتا ہے اور اسی کرپشن کے پیسوں
سے افسران عیاشیاں کرتے ہیں۔

س: آپ کا تعلیم حصہ لیا؟

ج: بین الاقوامی تعلقات میں (ایم آر) کیا ہے

س: آپ نے ریکروٹ کورس کب اور کہاں کیا ہے

ج: سال 2021 میں پولیس ٹریننگ کالج میں کیا ہے

س: آپ نے اور فورس کے علاوہ کوئی کورس کی ہے

ج: جی ہاں کیا ہے

س: براہ کرم بتائیں کہ آپ نے جو ٹیچر پوسٹ پر اپلائی کیا ہے
یہ سب میرے افسر کو نام کے ... کیا ہے

Attested
DSP/L-SSP

Attested
SP SSP Rizwan

Attested
SSP KK

پولیس کی طرف سے باہر ہی ہے۔

ج: جی ہاں اس ویڈیوز میں میں نے کوئی غلط بات نہیں کی
اور نہ اس میں کسی کو بھڑکایا ہے اور نہ کسی کو دھمکی دی ہے
میں نے اپنے حق کے لیے آواز اٹھایا ہے اور پولیس
کے غیر قانونی رویے کے لیے ہم نے یہ ویڈیوز اپ لوڈ کیے تھے

س: آپ SSG میں اور اپنے ڈسٹرکٹ پولیس کو بھی
اپنے کارکردگی پر سوال اٹھایا ہے؟

ج: یہ تمام ایک پولیس اور ادارہ ہے۔ جب ایک
یونٹ کوئی غلط کام کرتا ہے تو اسکا اثر
تمام محکمہ جات پر پڑتا ہے

س: آپ نے تفتیشی آفیسر تھے؟ اور نہ آپ چوری کے الزام
آفیسر تھے اور نہ آپ SHO آفیسر تھے۔ آپکے
پاس تو ان سارے الزامات کا مثلاً اسلحہ کی شہریت
تفتیش کرنے، منشیات کی فیور کرنا، رشوت لے

Attested
DSP/L-SSG

Attested
SP SSG/KK

کی کیا ثبوت ہیں

ج! میں نے بہت سے لوگ ایسے دیکھے ہیں۔ جب پولیس کسی شخص / ملزم سے اسلحہ پکڑتی ہے تو وہ جیل چلے جاتے ہیں واپس آتے ہیں۔ تو پولیس کے پاس کچھ اسلحہ کیس اصل ملزمان / اسلحہ واپس کرتا ہے۔ اسی طرح سینکڑوں کو ہم دیکھتے ہیں۔ کہ پولیس کی نقص ناقص تفتیش کی وجہ سے 3 دن بعد جیل سے نکل کر دوبارہ ویسا کام شروع کرتا ہے۔ ایسا طرح 302 قتل کے ملزمان جن پر دو قتل کرتے ہیں تو ناقص تفتیش کی وجہ سے باہر نکل جاتے ہیں۔

Attested
DSP/LSSO

Attested
SP.SSU Rzu

س! ان تمام کیسوں میں آپ کیا ایک کیس کی نشاندہی کر سکتے ہیں۔ تمام جج ایک انکوائری کے جس سے آپ کے بیان کی تائید یا تردید ہو

ج! میرے ساتھ والا ایک معاملہ ہوا تھا۔ جو کہ میں نے پولیس کے سر پر ٹھیکرا کیا تھا۔ جو ملزمان نے مجھ پر

PTO

پر فائرنگ کیا۔ جس وجہ سے میں واپس پر مکہ پہنچ گیا۔
جس رپورٹ میں نے پولیس چوکی کنڈا پورٹ تھانہ زیارت
میں ثاقب ASI کو کیا۔ لیکن انہوں نے ملزمان
کے اثر و رسوخ کی وجہ سے میرا پرچہ نہیں دیا۔
حالانکہ میں نے مذکورہ ملزمان کے ساتھ ملکر پولیس
کو گالیاں دے رہے تھے۔ اس علاوہ میرے
علم میں کوئی ایسا واقعہ نہیں ہے جس میں تھانہ کلاں
میں اپنے جناب IG صاحب جناب DPO صاحب
اور SHO صاحب کے متعلق الزام لگایا ہو
کہ انکے تبادلہ جات سیاسی اثر رسوخ پر ہوتے ہیں
اس بارے میں ایک سائل کیا کہہ سکتا ہے

2- جب MNA اور MPA الیکشن میں کامیاب
ہوتے ہیں۔ تو ہمارے افسران انکے چمچے بن جاتے ہیں
یاد رہے کیونکہ ہمارے ووٹ ہی ہوتے ہیں

Attested
DSP/HQrs

Attested
SI-SSU-RZ

افسران کے بارے میں ایک یہ الزام لگانے کا پولیس
رولز میں اپنا طریقہ کار ہے۔ اور شکایات کرنے کا بھی
اپنا فورم ہے۔ اس نے جو شکایات اور الزامات لگائے
تھے اس کو اس طریقہ کار کو فالو کرنا چاہیے تھا۔
ج ہائیکورٹ کی شکایات اور الزامات کو کوئی سنی نہیں جاتی
کیونکہ میں نے SSP میں اپنی انسٹرکشن اور فرد میں
دہشتگردی کے حوالے سے جناب IG صاحب اور جناب
کمانڈر ڈویژن SSG کو خط لکھا تھا جس پر
کسی قسم کی دہشتگرد کارروائی نہیں ہوئی۔ ملک اللہ
مجھے ڈرایا دھمکایا گیا۔ میں نے ج میں نے
سینئر بک پر ریکارڈ پر اب لوگ کہیں گے
کہ اکیلے رس ریکارڈ میں ظاہر ہوتا ہے کہ
پولیس کا لڑکا کرتے ہوں اور دھمکیاں دیتے
الکاروں کو لفافوں اور ٹیلیفون پر الزامات
ہیں۔

P.T.O

Attested
DSP/HQ

Attested
SP. SSU. RSU

ج: نہیں جناب! میں پولیس کی مخبر خانہ ہاری کا سنا ہوں

س: آپ کا بیلٹ نمبر، موبائل نمبر اور نیشنل ID کیا ہے؟

ج: بیلٹ نمبر 1098 موبائل 03143235235

2. Muhammad Muneeb ID اور نیشنل

Attested
DSP/HQ

Attested
SP. SSU. RZK

OFFICE OF SUPERINTENDENT OF POLICE SPECIAL SECURITY UNIT (CPEC) RASHAKAI ECONOMIC ZONE NOWSHEHRA KHYBER PAKHTUNKHWA

No 44 R/SP/SSU/RSEZ NOWSHERA Dated: 5 / 03 2024 (26)

FINDING REPORT OF DEPARTMENTAL ENQUIRY AGAINST CONSTABLE MUHAMMAD MUNEEB NO.1098 OF SSU (CPEC)

Kindly refer to your good office Statement of Disciplinary Action/Charge Sheet No.587/EC dated 28-02-2024.

This is a departmental enquiry against Constable Muhammad Muneeb No.1098, under the allegations that while posted at Platoon No.21 of SSU (CPEC) Unit Rashakai Special Economic Zone District Nowshera was found of misconduct of the following allegations:-

Found of gross misconduct by violating Rules-34(A) of the Khyber Pakhtunkhwa Government Servants (Conduct) Rules-1987 as well as chain of command by sharing statement on Social Media (Face book App) against Worthy Inspector General of Police & others Senior Officers, which brings a bad name to entire Police Force in the eyes of general public.

Attested DSP/LSC

To ascertain facts, the undersigned was nominated as enquiry officer & the delinquent official has submitted his reply in compliance of Statement of Disciplinary Action/Charge Sheet, wherein he admitted his guilt, while during cross questions, he again admitted the allegations by uploading the video on Face book/Social Media vide Annexure-A. USB of the video is also attached vide Annexure-B.

From the above discussion, the undersigned has reached to the conclusion that Constable Muhammad Muneeb has violated the chain of command and instigating the members of Police Force against Senior Police Officers with using abusive language against them.

It is added that Constable Jamshed No.1722 (Mob:0346-2159803) of FRP Bannu Police has also been involved in such like activities by uploading video on Social Media in favor of Constable Muhammad Muneeb No.1098 for the purpose to instigate Police Force against Senior Officers, therefore, he is required to be proceeded against departmentally.

Enquiry Officer's Recommendations

Constable Muhammad Muneeb No.1098 Platoon No.21 of SSU (CPEC) Rashakai Special Economic Zone is recommended for major punishment with registering a propercase against both the delinquent officials Under Section-118 Police Act-2017 of Khyber Pakhtunkhwa, so that to be an example for other members of Police Force.

E.C OR E.C

6/3/24

The constable was heard in person he has nothing to present in his defence in this enquiry

(SHAH MUMTAZ)SP
Superintendent of PoliceSSU
(CPEC) Rashakai Special Economic
Zone NOWSHEHRA
5-3-2024

FINAL SHOW CAUSE NOTICE

I Deputy Commandant, Special Security Unit (CPEC), Peshawar, a competent authority, under the provision of police Disciplinary Rules 1975 do hereby serve upon you, Constable Muneeb No. 1098 final show cause notice.

The Enquiry Officer, Mr. Shah Mumtaz SP Security Rashakai Economic Zone after completion of departmental proceedings, has found you Constable Muneeb No. 1098 guilty of the charges leveled against you in the charge sheet/statement of allegations and recommended you for major punishment.

And whereas, the undersigned is satisfied that you Constable Muneeb No. 1098 deserve the punishment in the light of the above said enquiry papers.

I, competent authority, have decided to impose upon you the penalty of minor/major punishment under police Disciplinary Rules 1975.

1. You are, therefore, required to show cause as to why the minor/major penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

2. If no reply to this notice is received within 07 days of its receipt, in normal course of circumstances, it shall, be presumed that you have no defense to put in and in that case as ex-parte action shall be taken against you.

(ABDUR RASHID)PSP
Deputy Commandant,
Special Security Unit (CPEC),
Khyber Pakhtunkhwa,
Peshawar.

Attested
DSP/L-SSU

No. 631 /EC dated Peshawar the 07 / 03 /2024.

Copy to official Concerned.

FC. Muhammad Muneeb No. 1098
CNIC. 16202-3680115-7
Mobile. 0311 3235235
dated. 07-03-2024

بیان از فائنل شوکاز نوٹس نمبر 631/EC مورخہ 07/03/24

(28)

مسروقہ خدمت ہو کہ سائل نے لاعلمی کی بنیاد پر سوشل میڈیا پر
ویڈیو پیغام جاری کیا جسکی بنیاد پر سائل آپ صاحبان
سے مستدعی خواہ ہے اور سائل کی فائنل شوکاز / انکوائری
کو ختم کیا جائے سائل تاحیات دعا گو رہیگا۔ اور آئندہ
کیلئے محتاط رہیگا۔

Attested
DSP/L-SSG

العبد

محمد منیب 1098/F.C پلاٹون 21 متعینہ اشکلی الکامل زون نوشہرہ

رابطہ: 0311-3235235

شناختی کارڈ نمبر: 16202-3680115-7

OFFICE OF THE DEPUTY COMMANDANT
SPECIAL SECURITY UNIT (CPEC)
KHYBER PAKHTUNKHWA POLICE, PESHAWAR

Central Police Officer (CPO), S.A.Q Road, Peshawar Cantt (ph: 091-9213211)

No. 677-90 /EC, dated Peshawar the 11 / 03 / 2024.

ORDER

This order will dispose-off departmental inquiry initiated against Constable Muneeb No. 1098 of Special Security Unit (CPEC), District Swabi.

Brief facts of the case are:

I. **That Constable Muneeb No. 1098 had violated Rule-34(A) of the Khyber Pakhtunkhwa Government Servants (Conduct) Rules, 1987 as well as chain of command by sharing statement on social media (Facebook app) against Worthy Inspector General of Police and other senior police officers.**
II. **That he had violated police rules 1975, 14-30 by involving in politics and sharing political posts on his personal Facebook account.**

In this regard, proper departmental proceeding was initiated against him. He was issued charge sheet & summary of allegations vide this office Endst: No. 587/EC, dated 28.02.2024 and Mr. Shah Mumtaz SP Security Rashakai Economic Zone was nominated as enquiry officer to conduct inquiry into the matter and submit his findings report. After completion of all codal formalities, EO submitted his findings report, wherein he reported that the alleged constable received charge sheet and furnished his written statement. During the cross-questioning process and in his written statement, the alleged constable confessed to the charges leveled against him. Thus, the enquiry officer recommended him for major punishment.

During the course of the inquiry, Constable Muneeb again shared/uploaded a video against his seniors, thereby violating the aforementioned rules once again. He was summoned for a personal hearing, held in the orderly room on 07.03.2024. Despite being given ample opportunities to prove his innocence, he failed to satisfy the undersigned. Subsequently, he was issued a final show cause notice vide this office No. 631/EC, dated 07.03.2024, to which he submitted a written reply that was found unsatisfactory.

Keeping in view all the above facts as well as recommendation of enquiry officer & material available on record, the above named constable was found guilty of the gross misconduct. Therefore, I, Deputy Commandant, Special Security Unit (CPEC), being the competent authority in the exercise of powers vested to me under section 5(4) of Khyber Pakhtunkhwa, Police Rules 1975 (amended in 2014) hereby awards him major punishment of **"Dismissal from Service"** with immediate effect. Additionally, the accountant SSU (CPEC) is directed to reckon & recover basic recruit training charges from him.

(ABDUR RASHID)PSP
Deputy Commandant SSU (CPEC),
Khyber Pakhtunkhwa, Peshawar.

Copy of the above is forwarded for information to the:

1. Accountant General, Khyber Pakhtunkhwa.
2. District Police officer, Swabi.
3. SP Security Rashakai Economic Zone District Nowshera with the directions to collect all the government/issued items/arms & ammunitions from constable Muneeb No. 1098.
4. Director ETEA & NTS with the request to black list his CNIC No. 16202-3680115-7 for Government Jobs in future until he submit pending dues/charges.
5. PA to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
6. PA to Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
7. Accountant, SRC, RI, OASI, I/C HRMS, I/C KOT and Clothing Godown SSU (CPEC).
8. Official Concerned.

(30)

OFFICE OF THE COMMANDANT
SPECIAL SECURITY UNIT (SSU)
KHYBER PAKHTUNKHWA POLICE

CENTRAL POLICE OFFICES, S.A.Q ROAD, PESHAWAR CANTT (PH: 091-9210056)

No. 929-32/EC. dated Peshawar the 01/04/2024.

Attested
DSP/L-SSU

ORDER

This order will dispose of the formal departmental appeal preferred by ex-constable Muneeb No. 1098 of Special Security Unit (CPEC) against the order of Deputy Commandant SSU (CPEC), wherein he was awarded major punishment of **"Dismissal from Service"** on the allegations that he had violated Rule-34(A) of the Khyber Pakhtunkhwa Government Servants (Conduct) Rules, 1987 as well as chain of command by sharing statement on social media (Facebook app) against worthy Inspector General of Police and other senior police officers. That he had violated police rules 1975, 14-30 by involving in politics and sharing political posts on his personal Facebook account.

In this regard, proper departmental inquiry was carried out. He was issued/served with charge sheet and summary of allegation. After completion of inquiry, the enquiry officer reported that the accused constable received charge sheet and submitted his written statement. During the cross-questioning and in his written statement he confessed to the charges leveled against him. Thus, the enquiry officer recommended him for major punishment.

During the course of the inquiry, Constable Muneeb again shared/uploaded a video against his seniors, thereby violating the aforementioned rules once again. He was summoned for a personal hearing, held in the orderly room on 07.03.2024. Despite being given ample opportunities to prove his innocence, he failed to satisfy the undersigned. Subsequently, he was issued a final show cause notice vide this office No. 631/EC, dated 07.03.2024, to which he submitted a written reply that was found unsatisfactory.

In the light of recommendation of enquiry officers and other material available on the record, he was awarded major punishment of **"Dismissal from Service"** vide order No. 677-90/EC, dated 11.03.2024.

Feeling aggrieved against the impugned orders of Deputy Commandant SSU (CPEC), Khyber Pakhtunkhwa, Peshawar, the appellant preferred the instant appeal.

The appellant was heard in orderly room held on 26.03.2024 and given ample opportunity to prove himself innocent but he failed. Also from perusal of the enquiry file, it has been found that the allegations were fully established against him by the Enquiry Officer during the course of enquiry. There doesn't seems any infirmity in the order passed by the competent authority, therefore, no ground exist to interfere in same.

Based on findings narrated above, **I, Commandant SSU (CPEC),** Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal. Therefore, the same is rejected and filed being meritless.

Order announced.

(MOHAMMAD ZAFAR ALI)PSP
COMMANDANT,
Special Security Unit (CPEC),
Khyber Pakhtunkhwa, Peshawar.

01-04-2024

Copy of the above is forwarded for information to the:

1. SP Admin & Minority SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
2. PA to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
3. PA to Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
4. Ex- FC Muneeb No. 1098.