

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

**Service Appeal No.772/2024.**

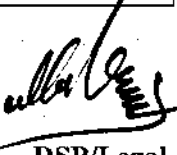
SI Hamayun Khan No. MR/30 of CCP, Peshawar.....Appellant.

**VERSUS.**

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others. Respondents.

**I n d e x**

S.NO	DOCUMENTS	ANNEXURE	PAGES
1	REPLY		1 to 4
2	Authority		5
3	AFFIDAVIT		6
4	Copy of list	A	7
5	Copy of Enquiry + Statements	B	8-18
6	Copy of Show Cause Notice	C	19

  
DSP/Legal, 21/08  
CCP Peshawar.

B

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

**Service Appeal No.772/2024.**

SI Hamayun Khan No. MR/30 of CCP, Peshawar.....Appellant.

**VERSUS.**

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others. Respondents.

**REPLY BY RESPONDENTS NO. 1&2.**

Respectfully Sheweth:-

**PRELIMINARY OBJECTIONS.**

1. That the appeal is badly barred by law & limitation.
2. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
3. That the appellant has not come to Hon'ble Tribunal with clean hands.
4. That the appellant has no cause of action and locus standi.
5. That the appellant is estopped by his own conduct to file the instant appeal.
6. That the appellant has concealed the material facts from Honorable Tribunal.
7. That the appeal is not maintainable being devoid of any merit.

**REPLY ON FACTS:-**

1. Incorrect. The appellant was appointed as PASI in the respondent department in the year 2009. Unfortunately, his performance throughout his service was consistently unsatisfactory and earned 01 bad entry and 02 Minor punishments on different occasions. Additionally, record revealed that he was involved in acts of bribery. These filthy actions have not only breached the principles of integrity and duty expected from a member of the force but also severely tarnished the reputation of the entire force. The appellant's behavior had certainly stigmatized the prestige of force, undermining public trust and the credibility of law enforcement. Furthermore, the august apex court has issued numerous judgments affirming that the act of accepting illegal gratification constitutes a grave offense, particularly for civil servants. In cases where a civil servant is found guilty of such an offense, it has been established that they cannot be retained in the civil service. (Copy of List is annexed as A)
2. Correct to the extent that Section 30 of the Khyber Pakhtunkhwa Police Act 2017 speaks regarding the filling of Inspectors through Departmental Promotion Committee as well as via Khyber Pakhtunkhwa Public Service Commission as per the ratio divided by the Section ibid. However, rest of the plea taken by the appellant is totally bereft of any substance because appointment/promotion through Fast Track Promotion to the rank of Inspector does not mean a clean chit that the appellant will not be held responsible for future wrong deeds..
3. Incorrect. The appellant, while posted as OII at Police Station Hayat Abad, Peshawar has been subjected to departmental proceedings due to serious allegations. He was tasked with investigating a case registered vide FIR No. 1754, dated 25.12.2023, under sections 9-D/11 CNSA. According to the complaint filed by Zarin Shah son of Zafar Khan, the appellant is accused of demanding and accepting a bribe of Rs. 550,000. This alleged payment was

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 15/65

Dated 23/8/24

purportedly made in exchange for favoring the complainant's son, who had been apprehended with a significant quantity of synthetic drugs. The appellant's actions constitute a grave violation of ethical and legal standards. Soliciting and accepting illegal gratification from individuals involved in drug trafficking not only undermines the integrity of the investigation but also severely damages the reputation of the police department. Such conduct is deemed unacceptable and falls squarely within the scope of corruption as defined by Police Rules. The seriousness of the charges reflects a significant breach of trust and professionalism expected from law enforcement personnel. This case highlights the critical need for strict adherence to ethical practices and underscores the department's commitment to upholding justice and integrity.

4. Incorrect. The complaint was probed into through preliminary inquiry conducted by the SSP Investigation to uncover the true nature of the allegations. During this process, the Enquiry Officer recorded statements of all parties involved, including the complainant and the appellant. The Enquiry Officer conducted enquiry into the matter, examining all evidence and testimonies presented. The examination of materials so presented revealed that the appellant was indeed involved in the illegal act of accepting bribes from the complainant. Specifically, it was confirmed that the appellant solicited and received a sum of Rs. 550,000 in exchange for favorable treatment regarding the complainant's son, who had been arrested with a large quantity of synthetic drugs. The findings of the inquiry substantiated the allegations of corruption and illegal gratification. The Enquiry Officer report clearly demonstrated that the appellant's actions were in violation of legal and ethical standards, reflecting a serious breach of integrity. This outcome underscores the need for appropriate disciplinary measures and reinforces the commitment of the department to uphold the principles of justice and accountability. (Copy of Enquiry report is annexed as B)
5. Incorrect. After receipt of finding of preliminary enquiry proceedings he was issued Show Cause Notice under Rules 5 (3) of Khyber Pakhtunkhwa Police Rules 1975 (amended 2014) and served upon him vide No. 171/PA, dated 16.01.2024 to which he replied, but was found unsatisfactory. (Copy of Show Cause Notice is annexure as C).
6. Incorrect. After the completion of all codal formalities, it was determined that the charges against the appellant for accepting illegal gratification were a serious breach of discipline and integrity expected from a member of a law enforcement agency. Given the gravity of the offense and the thorough enquiry that substantiated the appellant's involvement in corrupt practices, the decision was made to impose a major penalty. Consequently, the appellant was rightly dismissed from service vide Order No. 461-74/PA, dated 09.02.2024. This action reflects the department's commitment to maintaining high ethical standards and ensuring accountability for actions that undermine the integrity of the police force.
7. Correct to the extent that the appellant filed departmental appeal which was thoroughly processed and sufficient opportunity of hearing was provided to him. The Appellate Authority took a lenient view, accepted his appeal and the dismissal order was modified, the punishment was reduced from dismissal to a major penalty of reversion from the rank of

Inspector to Sub-Inspector. Moreover, his period remained out of service was treated as leave without pay vide order No. 1352-56/24, dated 23.05.2024.

8. That appeal of the appellant being devoid of merits and limitation may be dismissed on the following grounds.

**REPLY ON GROUNDS:-**

- A. Incorrect. The order passed by the competent authority is just legal, and has been passed in accordance with law/rules.
- B. Incorrect. The appellant was treated as per Law/Rules, and no violation of Article 4, 10-A & 25 of the Constitution of the Islamic republic of Pakistan 1973 has been committed by the replying respondents.
- C. Incorrect. After Completion of all codal formalities he was awarded major punishment of Dismissal from service. The appellant then filed departmental appeal which was partially accepted by the Appellate Board and the dismissal order was modified, the punishment was reduced from dismissal to a major penalty of reversion from the rank of Inspector to Sub-Inspector in accordance with law/rules.
- D. Incorrect. The appellant's involvement in accepting illegal gratification constitutes a violation of the principles enshrined in the Constitution of the Islamic republic of Pakistan. As a member of a disciplined force, such conduct is not only a breach of legal and ethical standards but also a significant affront to the integrity and reputation of the police force. Given the gravity of this misconduct, it is deemed intolerable within the force and undermines the foundational values of law enforcement. In light of these circumstances, it is concluded that the appellant's actions reflect a serious lapse in discipline and integrity. Consequently, no fundamental rights of the appellant were violated during the disciplinary process.
- E. Incorrect. As explain above in detail, however, the allegation was proved against him beyond any shadow of doubt.
- F. Incorrect. The appellant was issued Show Cause Notice as per Rules 5 (3) of Police Rules 1975 amended (2014) provided that" if the authority decides that the misconduct or act of omission or commission referred to above should be dealt with in General Police proceedings he shall proceed as under:-
  - a) The authority shall determine if in the light of facts of the case or in the interests of justice, a departmental inquiry, through an Inquiry Officer if necessary. If he decides that is not necessary; he shall-
  - b) By order in writing inform the accused of the action proposed to be taken in regard to him and the grounds of the action: and
  - c) Give him a reasonable opportunity of showing cause against that action: Provided that no such opportunity shall be given where the authority is satisfied that in the interest of security of Pakistan or any part thereof it is not expedient to give such opportunity."
 As discussed in detailed in the rules ibid, there was no need for regular departmental enquiry. The appellant was punished on the grounds of misconduct, as his guilt has been proved beyond any shadow of doubt. .
- G. Incorrect. As explained above.

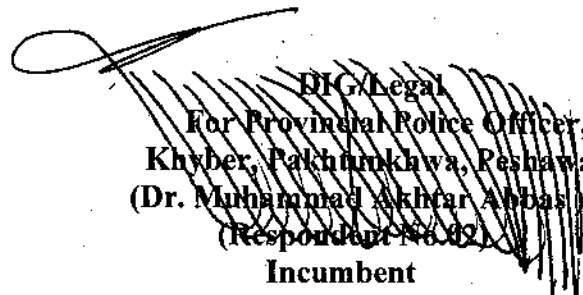
- H. Incorrect. The Punishment order passed by the competent authority is based on justifiable and genuine grounds, without any malafide intension, hence liable to be upheld.
- I. Incorrect. The whole preliminary enquiry proceedings were conducted by SSP Investigations purely on merit and accordance with law/rules.
- J. Incorrect. Preliminary enquiry was conducted as per law/rules and the enquiry officer reported that charges leveled against the appellant were proved beyond any shadow of doubt. The appellant was provided full opportunity of defense and also recorded the statement of all concerned, but the appellant failed to defend himself. After fulfilling all codal formalities he was awarded the major punishment.
- K. Incorrect. The charges leveled against him were proved hence, he was awarded the major punishment.
- L. Incorrect. As explained in detail in proceeding paras.
- M. Incorrect. The appellant was provided full opportunity but failed to defend himself with plausible/justifiable grounds.
- N. Incorrect. The performance of the appellant during service was neither satisfactory nor up to the mark and his involvement in taking illegal gratification/bribe speaks volume of his inefficiency.
- O. Respondents also seek permission of this Hon'ble Tribunal to raise additional grounds at the time of arguments.

**Prayers:-**

Keeping in view the above stated facts & reasons it is, most humbly prayed that the appeal of the appellant being devoid of merits and limitation, may kindly be dismissed with costs please.



**Capital City Police Officer,  
Peshawar.  
(Qasim Ali Khan) PSP  
(Respondent No.01)  
Incumbent**



**DIG/Legal  
For Provincial Police Officer,  
Khyber, Pakhtunkhwa, Peshawar.  
(Dr. Muhammad Akhtar Abbas) PSP  
(Respondent No.02)  
Incumbent**

5

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

**Service Appeal No.772/2024.**

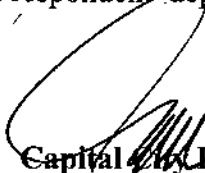
SI Hamayun Khan No. MR/30 of CCP, Peshawar.....**Appellant.**

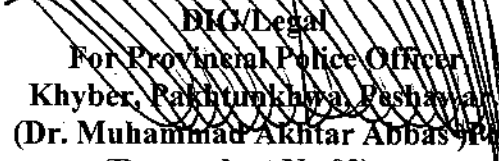
**VERSUS.**

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others. **Respondents.**

**AUTHORITY.**

We respondents are hereby authorize Mr.Inam Ullah DSP legal of Capital City Police, Peshawar to attend the Hon'ble Court and submit written reply, statement and affidavit required for the defense of above service appeal on behalf of respondent department.

  
Capital City Police Officer,  
Peshawar.  
(Qasim Ali Khan) PSP  
(Respondent No.01)  
Incumbent

  
DIG/Legal  
For Provincial Police Officer  
Khyber, Pakhtunkhwa, Peshawar  
(Dr. Muhammad Akhtar Abbas) PSP  
(Respondent No.02)  
Incumbent

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

**Service Appeal No.772/2024.**

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**AFFIDAVIT.**

I respondent No. 01 do hereby solemnly affirm and declare that the contents of the written reply are true and correct to the best of my knowledge and belief and nothing has concealed/kept secret from this Hon'ble Tribunal. It is further stated on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defense have been struck off.



*(Signature)*  
Capital City Police Officer,  
Peshawar.  
(Qasim Ali Khan) PSP  
(Respondent No.2)

BIO DATE OF Humayun Khan s/o Said-ur-Zaman FOR APPEARING IN THE ORDERLY ROOM

7

Name/No	Home Address	Date of Enlistment	Charges					E.O Name/Recom:	Punishment	Plea of the Applicant	Remarks/ Opinion of DSP/Legal	Order of the CCPO				
SI Humayun Khan No. MR/30		16.03.2009	Shorts facts leading to the instant appeal are that the appellat while posted as SHO PS Mathra was proceeded against departmentally that as per report of AIG Inquiry Internal Accountability, Khyber Pakhtunkhwa. Complainant Muzafar Shah s/o Sadar Shah r/o Chaghar Matti Mathra Peshawar submitted complaint on 02.10.2021, that SHO Police Station Mathra illegally raided on his house and arrested his son and kept him in lockup and registered case u/s 216 PPC. He was released by the court. He is underage. In the year 2003 his uncle committed offence while in the said time he was not born nor his uncle is residing in his house. In a preliminary inquiry the E.O conclusion that he was found guilty of gross misconduct/misuse of authority by registration of FIR u/s 216 PPC against the complainant being underage and illegal detention of Sadar Shah (Complainant father).					SP/Cantt:  Minor Punishment	Forfeiture of 01 year approved service  By SSP/Ops:  Vide order No.198-200/PA  Dt:21.01.2022  (Appeal on Time)	Request to set-aside the punishment	Perusal of relevant available record reveals that punishment awarded by the competent authority is in accordance with law.	Accepted Censured  25/5/22				
		Total Qlty: Service														
		12 years, 11 months & 08 days														
		D.O.B														
		26.02.1983														
		Education											Entries:-			
		MBA														
		Courses											Bad	Minor	Major	Good
-Lower intermediate -Upper	01	02	Nil	03												

Allesha  
02



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

Office Ph:No. 091-9210642

No. 245 /PA, Dated Peshawar the 10/01 /2024. E-21

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 (F/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). (F/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.

*Atiqe*  
*[Signature]*

**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 ATTIQUE 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 xtency 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/E)**

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/F)**

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 Pishtakhara, while when they reached Pishtakhara 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.

*Atiqe*  
2

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

Office Ph: No. 091-9210642

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

STATEMENT OF AMIR KHAN S/O SUFAID 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 Juraid on motorcycle followed the motor car of Haji Zarin Shah toward Pishtakhara, while when they reached Pishtakhara 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.

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

PA.

*Be Arif to  
respond*

*PA. / Same Sec p/c ASAD.*

*19*  
*11/1*  
CCP, PESHAWAR

*ASAD*  
*19*

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.

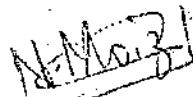
While on patrolling duty in the aforementioned area, I received credible information about the arrest of two accused involved in drug trafficking who were shifted to PS Hayatabad. Subsequently, I also visited PS Hayatabad, where I gathered comprehensive details about the accused. A significant amount 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.

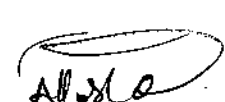
This statement is made to provide a clear and accurate account of the events surrounding the arrest and subsequent proceedings. I am fully committed to support any investigations and ensure transparency in the pursuit of justice.

Submitted, please.

Attested  
10  
09/01/2024

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

Scanned with CamScanner

  
Q

جناب عالی!

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ درخواست اذان زرین شاہ ولد ملزم عامر خان بحوالہ مقدمہ علت 1754 مورخہ 25.12.2023 جرم-9D CNSA/11A-CNSA/15-AA تھانہ حیات آباد معروض خدمت ہوں کہ مقدمہ بالا کی تفتیش میرے حوالے تھی۔ مقدمہ ہذا میں قبضہ شدہ Revo گاڑی ملزم گرفتار شدہ کے بھائی کے نام پر ہے۔ اس سلسلہ میں ملزم کے بھائی حسب ضابطہ تھانہ طلب کیا گیا ہے۔ علاوہ ازیں ملزم اور خواست 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 لخت جگر بننے کو تفتیش میں ریلیف حاصل کرنے کے لیے راہ ہموار کرنے اور تفتیش کو متاثر کرنے کی کوشش کی گئی ہے۔

Insp/OII PS Hayat Abad  
03.01.2024

Attested  
10  
04/01/2024

Attested  
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INSPECTOR

صیانت آباد

بیان از اسٹیشن ہاؤس (141P)

بدریافت بیان عورت نہ سبب بلکہ اسے تقاضا صیانت آباد میں دی گئی ہے

تاریخ 24/12/2023 صاحب صیانت آباد اسٹیشن ہاؤس علم ظاہر رہا

ادرجات ASP میں ہے پاس تھا۔ بوقت وقوع روز میں صیانت آباد میں واقع ہو گیا۔  
نوڈیل ٹویک صیانت آباد، صبح آس، اجازت پاس، صیانت آباد، صیانت آباد

ASP صاحبہ وقوع پر موجود تھے اور حالات FIR عدالت نمبر 1754/23 سے 90/NSA-11/NSA/ISAA

مطلوبہ دیکھا درست ہے۔ علیہ ما روایتی سیری اور دو بلا اشتراک اور ASP صاحبہ صیانت آباد  
کی موجودگی اندر لایا گیا ہے۔ اس میں کوئی شک نہیں ہے۔ اس کے خلاف کوئی شک نہیں ہے۔  
رشتہ بندی میں اور نہ ہی کوئی شک نہیں ہے اور نہ ہی سیرے سامنے کوئی اشتراک نہیں ہے  
آیا ہے اور نہ ہی سیرے علم میں ہے FIR ہمراہ لے کر۔ یہ سیرا بیات ہے  
چکہ درست ہے۔

Si/PS.HA  
11/12/2024  
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Attested  
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طروفہ فرودت معون کہ سائیل SDDPO/ASP - قیادت آباد  
ساتھ ملوور PSO تعینات ہے۔ سائیل بروز وقوع  $26 \frac{12}{23}$   
نوبت 1:50 AM اور SDDPO صاحبہ جمع ٹیم جاکے وقوع جاکر  
و بیان سے وفاقی پولیس نے ملزم عامر ولد ارشد شاہ  
ملزم حسین ولد شاہ حسین ساکنان نزدیکی کوئل حسب  
منازلہ گرفتار کر کے جس کے قبضے سے 1250 عدد نشہ آور  
گولیاں، 2400 گرام آئس اور 5 بیزار گرام چرس  
برآمد کر کے۔ جسے 70 صاحبہ پولیس انسٹیٹوٹ ملوور  
رک جو کہ تمام حیات آباد میں موجود ہے۔

بعد از رجسٹریشن FIR مورخہ  $26 \frac{12}{23}$  کو ملوور  
بارانہ مسی عامر نامی شخص کو بوجہ اشتہ فرودت  
مختم مذکورہ سائیل میں لاکو روکے دینے سے۔  
جو کہ اشتہاریت کے بناء پیر من سائیل نے اپنا اکاؤنٹ  
مخبر فراہم کر کے میرا اکاؤنٹ سے اپنے دن مسی عامر  
کو حوالہ درست طور پر جو کہ مسی عامر سے اس  
بار میں بوجھا جا سکتا ہے۔ عمر وہاں میں سائیل  
نے دوران سرویس اشتہار بارا کو اس قسم کی شکایت  
کا وقوع نہیں دیا ہے اور اپنی ڈیوٹی ایمپلائری اور  
فوش اہلوچی سے بھائی ہے۔ میں میرا بیان ہے جو  
حقیقت پر مبنی ہے۔

Attested  
05/01/2024

بین الرحمن صاحب

میتق الرحمن متیقم SDDPO / PSO حیات آباد

Attested  
12

بیان زمین شناسی و دیگر تفصیلات

پتھلیس ریفورسٹ نیشنل سٹریٹجی 1754، فرم CNSA 11-9D  
صفحہ 25، 26، 27، 28، 29، 30، 31، 32، 33، 34، 35، 36، 37، 38، 39، 40، 41، 42، 43، 44، 45، 46، 47، 48، 49، 50، 51، 52، 53، 54، 55، 56، 57، 58، 59، 60، 61، 62، 63، 64، 65، 66، 67، 68، 69، 70، 71، 72، 73، 74، 75، 76، 77، 78، 79، 80، 81، 82، 83، 84، 85، 86، 87، 88، 89، 90، 91، 92، 93، 94، 95، 96، 97، 98، 99، 100

پتھلیس ریفورسٹ اور جھاڑو ام 12 صفحہ 24/11/2023 کو وقت

رات 11/10 بجے شہر سے نڈری کوئی جارہے تھے کہ شہرہ مارنے کے

قوبہ یوں ابھراں نے مذکورہ بلکہ کیا تو کسی باپ پر تلخ کلیدی

پتھلیس ریفورسٹ مقصدہ عنوان پتھلیس ریفورسٹ کیا گیا تھے جب معاملہ بڑا

کا اطلاق ہوئی تو میں نے اپنے دوست خالد خان (جو کہ پتھلیس

ریفورسٹ پتھلیس ریفورسٹ) کو پتھلیس ریفورسٹ اور جھاڑو ام کو پتھلیس

ریفورسٹ پتھلیس ریفورسٹ میں پتھلیس ریفورسٹ خالد خان نے پتھلیس

ریفورسٹ (011) پتھلیس ریفورسٹ پتھلیس ریفورسٹ اور پتھلیس ریفورسٹ

پتھلیس ریفورسٹ 011 پتھلیس ریفورسٹ پتھلیس ریفورسٹ طلب کرنے کے

جو کہ میں نے پتھلیس ریفورسٹ پتھلیس ریفورسٹ پتھلیس ریفورسٹ

پتھلیس ریفورسٹ خالد خان نے پتھلیس ریفورسٹ پتھلیس ریفورسٹ

پتھلیس ریفورسٹ پتھلیس ریفورسٹ پتھلیس ریفورسٹ پتھلیس ریفورسٹ

Handwritten signature and date: 25/12/2023

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14	SUBS INSPECTOR	PS, FAOIRAHAD	Peshawar OPERATION
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بندر مورخ 23/01/2024 حاضری زریں شہد کے بیان نامہ آپ

خالق کے ساتھ چلے گا اور یہ پانچ لاکھ روپے کی رقم ہے جس کی رقم پر  
 میں میری صاحبزادی شہد کے دوست خالدا کو حاجی زریں شہد کے گھر کے پانچ واقعہ  
 صیانت آباد میں رہتی ہیں۔ میں اور میرا بڑا بھائی حاجی زریں شہد اپنے مونس سائیکل پر حاجی  
 زریں شہد کے دوست کے گاڑی/سوٹر ڈرائنگ کے پیچھے روانہ ہو گئے۔ حاجی زریں شہد  
 دوست نے بتایا کہ پانچ لاکھ روپے کے پیسے رکھ کر گیا ہے۔ میں دستخط کر کے  
 ہوں آپ میرے پیچھے آ جاؤ۔ دستخط لکھنے میں حاجی زریں شہد کے دوست نے مجھے  
 بتایا کہ پانچ لاکھ روپے کے پیسے رکھ کر گیا ہے اور مجھے زریں شہد کے دوست کے  
 پاس نہیں۔ تو میری حاجی زریں شہد کے دوست خالدا کو بتایا کہ زریں شہد کے دوست  
 ہیں۔ میں اور میرا بڑا بھائی مونس سائیکل پر آگے آپ کو زریں شہد کے دوست کے پاس  
 میں آگے آگے رہا اور زریں شہد کے دوست کے پاس آگے آگے گھر کے پاس  
 ایک پہلے کے باغ میں کرا شریف ہی تھی جو لکھنؤ میں ہے گن میں Gunman لگا رہا تھا۔  
 میری حاجی زریں شہد کے دوست خالدا کے پاس میرا گیا اور ہم وہاں سے اپنے گھر روانہ  
 ہو گئے۔ بعد میں خالدا نے حاجی زریں شہد کو کال کر کے بتایا کہ آپ کے پاس  
 روپے پانچ لاکھ کو مل گئے ہیں۔

*[Signature]*  
 4/1/2024  
 0302-5243439

Attested  
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 04/01/2024



Attested  
*[Signature]*

بیان ازالہ عیبرت خان دربار مستند اللہ خان سکندر زردین لکڑی ٹولہ  
(مستند عیبرت خان مستند اللہ خان)

جمع کے دن تبارخ 23/12/2024 حاجی زردین نے مجھے بتایا کہ آپ عیبرت دوست تبارخ کے  
طے خاطر تاکہ وہ پانچ لاکھ روپے بھائیوں فلان کو دے۔ میں اور میرا چھوڑ دانی  
محمد منیر مونس سبکل پر حاجی زردین شاہ کے دوست فالید کے گاڑی / مونس کوڑے مجھے  
روانہ پورے۔ حاجی زردین کے دوست فالید نے مجھے بتایا کہ میں لیکن ان دنوں ہزار ہرت  
آپ سے مجھے آجیلا۔ لیکن یہ لیکن ہے حاجی زردین شاہ کے دوست تبارخ تبارخ  
مجھے Neo مونس / سوری کا بتایا ہے۔ اور مجھے Neo مونس / سوری کا بتایا ہے۔ خیر۔  
جسٹ ڈھائی چھ لاکھ کو Neo مونس کو بتایا تھا تو فالید کو پتہ چلا کہ آپ سوری  
سے آجیلا اور Neo مونس کی لکڑی میں چھوڑ دانی کھواری۔ اور وہ  
Neo مونس کے آگے دو تہہ میں دیکھ لیں جو کہ بنطاریں ہیں۔ میں  
لگے آجیلا۔ خیر حاجی زردین شاہ کو دوست فالید ان کے پاس آجیلا اور پھر  
میں ان کو روانہ پورے اور پھر میں فالید حاجی زردین شاہ کو فون کر کے بتایا  
آپ نے پانچ لاکھ روپے بھائیوں کو بھل گئے ہیں۔

Arif

4/1/2024

0315-5146403

Affected

40  
04/01/2024

Attest





OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

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

No. 171 /PA/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 **OII Police Station Hayatabad**, 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 s/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.

*Handwritten signature*

Received by:

Hamayun  
18/1/24